



MEETING : DISTRICT PLANNING EXECUTIVE PANEL
VENUE : COUNCIL CHAMBER, WALLFIELDS, HERTFORD
DATE : MONDAY 8 DECEMBER 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.

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DISCLOSABLE PECUNIARY INTERESTS

1. A Member, present at a meeting of the Authority, or any committee, sub-committee, joint committee or joint sub-committee of the Authority, with a Disclosable Pecuniary Interest (DPI) in any matter to be considered or being considered at a meeting:
 - must not participate in any discussion of the matter at the meeting;
 - must not participate in any vote taken on the matter at the meeting;
 - must disclose the interest to the meeting, whether registered or not, subject to the provisions of section 32 of the Localism Act 2011;
 - if the interest is not registered and is not the subject of a pending notification, must notify the Monitoring Officer of the interest within 28 days;
 - must leave the room while any discussion or voting takes place.
2. A DPI is an interest of a Member or their partner (which means spouse or civil partner, a person with whom they are living as husband or wife, or a person with whom they are living as if they were civil partners) within the descriptions as defined in the Localism Act 2011.
3. The Authority may grant a Member dispensation, but only in limited circumstances, to enable him/her to participate and vote on a matter in which they have a DPI.

4. It is a criminal offence to:

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

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

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AGENDA

1. Apologies

To receive apologies for absence.

2. Chairman's Announcements

3. Minutes (Pages 5 - 14)

To approve the Minutes of the meeting of the Panel held on 22 October 2014.

4. Declarations of Interests

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

5. The Bishop's Stortford Goods Yard Update Report (Pages 15 - 74)

6. Draft District Plan – Retail and Town Centres Policy Critical Friend Appraisal (November 2014) (Pages 75 - 100)

7. Authority Monitoring Report 2013/14 (Pages 101 - 176)

8. Delivery Study Update Report (Pages 177 - 202)

9. Duty to Co-operate Update Report (Pages 203 - 220)

10. Draft District Plan Chapters 17-19: Response to Issues Raised During Preferred Options Consultation and Draft Revised Chapters (Pages 221 - 324)

11. 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.

MINUTES OF A MEETING OF THE
DISTRICT PLANNING EXECUTIVE PANEL
HELD IN THE COUNCIL CHAMBER,
WALLFIELDS, HERTFORD ON
WEDNESDAY 22 OCTOBER 2014, AT 7.00
PM

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

ALSO PRESENT:

Councillors D Andrews, E Buckmaster,
G Jones, J Jones, M McMullen, P Moore,
M Newman, T Page, M Pope, P Ruffles,
K Warnell and G Williamson.

OFFICERS IN ATTENDANCE:

Chris Butcher	- Senior 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 Team Leader

Kevin Steptoe - Head of Planning
and Building
Control Services

ALSO IN ATTENDANCE:

Paul Jobson - Peter Brett Associates

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

The Panel considered a report presenting the findings of the East Herts Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study, September 2014. This made recommendations on the manner in which the identified accommodation needs of Gypsies and Travellers and Travelling Showpeople could potentially be met in the District for the period to 2031.

Before any consideration of the report, Officers advised that a few factual inaccuracies concerning two existing authorised sites detailed in the study had come to light. These were not of a material nature and would be corrected in the final version.

The Panel Chairman welcomed Paul Jobson, Peter Brett Associates, who was in attendance to give a presentation on the Identification of Potential Sites Study (IOPS). Mr Jobson detailed:

- the purpose of the IOPS and national policy requirements;
- existing provision and needs within East Herts;
- potential assessment areas and site criteria;
- sources of sites for assessment; and
- the outcomes of the Study.

In response to various questions, Mr Jobson and Officers outlined the consultation that had taken place with

stakeholders, which had included onsite meetings. They referred to the reasons why some publicly owned land had been identified as unsuitable sites as set out in Appendix D of the Study. It was emphasised that the District Plan would need to identify a five year supply of specific deliverable sites in the plan making period. In terms of determining planning applications, these would need to be considered on their merits in accordance with policies within the adopted Local Plan (or District Plan when adopted), along with Planning policy for travellers guidance and the National Planning Policy Framework.

The Panel Chairman added that no decisions on suggested sites were being proposed at this meeting and that the proposed working group would consider further the site options of the IOPS. The Council would follow the same approach in respect of Green Belt considerations towards potential traveller sites as the principles being used towards potential site allocations for general housing.

The Panel supported the recommendations as now detailed.

RECOMMENDED – 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;

(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.

12 **MEAD LANE URBAN DESIGN FRAMEWORK**

Consideration was given to a report presenting the main issues raised during the consultation on the draft Mead Lane Urban Design Framework (UDF). The report also sought 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).

In response to Members' questions, Officers advised that discussions with the County Council over education provision were ongoing and reference was made to the outcome of a recent planning application relating to Simon Balle School. Although the UDF made reference to the general character of the area, its purpose was to provide a broad framework. If adopted, it would be given significant weight in the planning application process.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the issues raised during the public consultation on the draft Mead Lane Urban Design Framework, together with the Officer responses, be agreed;

(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).

13 **NEIGHBOURHOOD PLANNING GUIDANCE NOTE**

The Panel considered a proposal to publish an updated guidance note on Neighbourhood Planning. A number of amendments had 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.

The Panel supported the proposal as now detailed.

RECOMMENDED – that the Neighbourhood Planning Guidance Note contained at Essential Reference 'B' to the report submitted be agreed and published.

14 **GREATER ESSEX DEMOGRAPHIC FORECASTS 2012 – 2037 PHASE 6 MAIN REPORT, SEPTEMBER 2014**

The Panel considered a report setting out the findings of the Greater Essex Demographic Forecasts 2012 - 2037 Phase 6 Main Report, which was intended to form part of the evidence base for generating an appropriate District-wide housing target for the period 2011 to 2031, and to inform and support the East Herts District Plan.

The Panel noted Councillor G Jones' continued scepticism over the estimated housing need.

The Panel supported the recommendation as now detailed.

RECOMMENDED – that 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.

15 DELIVERY STUDY UPDATE REPORT

The Panel received an update on progress with the Delivery Study, a critical piece of the evidence base for the emerging District Plan as it would determine 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 might be needed in terms of the scale of developer contributions to meet wider policy objectives (such as affordable housing) and support for the infrastructure needed to deliver the growth.

It was noted that Peter Brett Associates (PBA) had been appointed to undertake the Study and the Panel Chairman referred to their role as a critical friend. Officers highlighted their initial advice around the calculation of the housing requirement, the duty to cooperate and the importance of transport modelling in managing congestion.

Councillor G Jones questioned why the rise in the buffer requirement from 5% to 20% proposed by PBA had not been recognised earlier. Officers acknowledged that the rise was significant and could require additional sites to be brought forward, or existing sites to be brought forward earlier in order to achieve the 5-year housing land supply. The publication of new government guidance, and new evidence of the Planning Inspectorate's tough stance, had become available since the 5% proposal in the draft Plan. PBA had been appointed to challenge the Council as a critical friend so as to help achieve a sound plan by the time of Examination.

Councillor G Jones commented on PBA's recognition of the gap in the evidence around the cumulative impact of growth. Officers explained that further transport modelling was being undertaken to look at this, and PBA would be providing further advice as part of the commission. Councillor T Page further questioned the

impact of development in north-west Essex on parts of East Herts. Officers replied that the Council would be represented at the Examination hearings into the Uttlesford Local Plan, and this issue would be given attention by the Planning Inspector.

Councillor T Page asked how 'severe' transport impacts could be defined, and how this would apply to the District Plan proposals. Officers explained that both PBA and ATLAS were looking into this further. However, initial indications were that the Planning Inspectorate did not view worsening congestion as a reason to fail to meet to housing needs. This position was being kept under careful review in relation to the site options and the cumulative impacts, and the scope for putting in place specific transport strategies and mitigation measures would be considered further.

Councillor E Buckmaster asked what the situation would be if limited or no mitigation measures could be identified. Officers replied that this was a difficult question in light of the initial advice from PBA and all possible solutions would be carefully investigated. Further advice would be sought from PBA.

Councillor G Jones pointed to the ATLAS advice about development embargoes unless adequate infrastructure was forthcoming. Officers commented that the ATLAS advice pointed to the importance of getting a plan in place, because such requirements would be embedded in policies within the adopted plan.

The Panel supported the recommendation as now detailed.

RECOMMENDED – that 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 of the report submitted, be noted.

16 **DUTY TO CO-OPERATE UPDATE REPORT**

The Panel received the notes of the latest round of Member-level meetings with adjoining Local Planning Authorities. Consideration was also given to the progress made in setting up the 'Co-Operation for Sustainable Development Group', involving Authorities in eastern Hertfordshire, western Essex, and north London.

The Panel supported the recommendations as now detailed.

RECOMMENDED – 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.

17 **EAST HERTS RESIDENT SURVEY ON THE DRAFT DISTRICT PLAN, JULY 2014**

The Panel considered the findings of the East Herts Resident Survey on the Draft District Plan Preferred Options undertaken between 22nd May and 8th June 2014. The report detailed the methodology used in the telephone survey of 502 residents. Various typographical errors were highlighted by Officers.

The Panel supported the recommendation as now detailed.

RECOMMENDED – that 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.

18 **DRAFT DISTRICT PLAN CHAPTERS 20-25: RESPONSE TO ISSUES RAISED DURING PREFERRED OPTIONS CONSULTATION AND DRAFT REVISED CHAPTERS**

The Panel considered a report drawing attention to 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. The Panel also considered draft revised chapters showing proposed amendments, for subsequent incorporation into a revised Draft District Plan.

The proposed amendments were presented as working Draft Revised Chapters only at this stage, as they might change before final agreement of a revised Draft District Plan. Therefore, these Revised Chapters would only be presented to the Executive until such time that the complete suite of amendments were collated and presented as one comprehensive Revised Draft District Plan.

Officers referred to a missing page from the printed version of the agenda in respect of the Issues report for Chapter 21 – Heritage Assets. A revised version was tabled which had been amended to take account of comments received from the Bishop's Stortford Museums Trust relating to the storage of materials uncovered during excavation. Councillor G Jones suggested that the amendment should also make reference to making the evidence publicly available. Officers undertook to consider this further.

The Panel supported the recommendations as now detailed.

RECOMMENDED – 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 - G to this report, be received;

(B) the Officer response to the issues referred to

in (A) above, as detailed in Essential Reference Papers B - G to the report submitted, be noted; and

(C) the draft revised chapters, as detailed in Essential Reference Papers B - F to the report submitted, be noted, with decision on their final content being deferred to allow consideration of further technical work and other issues.

19 CHAIRMAN'S ANNOUNCEMENTS

The Panel Chairman welcomed the press and public to the meeting and reminded everyone that the meeting was being webcast.

He reminded Members that the next Panel meeting would be held on 8 December 2014. Before then, a further meeting with parish and town council representatives had been arranged for 6 November 2014.

Finally, the Panel Chairman apologised for various typographical errors that had been identified in the agenda papers and stated that these would be referred to when relevant.

20 MINUTES

RESOLVED – that the Minutes of the Panel meeting held on 17 July 2014, be approved as correct record and signed by the Chairman.

The meeting closed at 9.03 pm

Chairman
Date

EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 8 DECEMBER 2014 EXECUTIVE – 6 JANUARY 2015

REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING AND TRANSPORT

BISHOP'S STORTFORD GOODS YARD UPDATE REPORT

WARD(S) AFFECTED: BISHOP'S STORTFORD CENTRAL

Purpose/Summary of Report

- This report provides an update on progress with a planning framework for the Bishop's Stortford Goods Yard, including a suggested way forward towards a planning application, which the site promoters have stated is anticipated in September 2015.
- The report explains that there are likely to be difficult trade-offs between the various aspirations for the site, given the need to ensure deliverability of development, and that these should be addressed through the Neighbourhood Plan group.
- It also recommends that current Local Plan policy be struck through and replaced with a new policy context provided by the emerging District Plan and Neighbourhood Plan.

RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL AND EXECUTIVE: That:

(A)	Local Plan 2007 Policy BIS11, The Goods Yard/John Dyde Training College Site, be struck through as out of date and no longer providing a suitable policy framework for consideration of a planning application;
(B)	to inform emerging policy for the Goods Yard site, the District Council should work in partnership with the Neighbourhood Plan team to agree a set of priorities for the site, and working in conjunction with the site promoters to agree cost/value inputs to inform development choices based around an agreed priority list; and
(C)	the new policy context for the planning application be provided by a revised District Plan Policy on the Goods

	Yard, subject to further public consultation, and closely aligned with any emerging Neighbourhood Plan policy for the site.
<u>RECOMMENDATIONS FOR COUNCIL:</u> That:	
(A)	Local Plan 2007 Policy BIS11, The Goods Yard/John Dyde Training College Site, be struck through as out of date and no longer providing a suitable policy framework for consideration of a planning application;
(B)	to inform emerging policy for the Goods Yard site, the District Council should work in partnership with the Neighbourhood Plan team to agree a set of priorities for the site, and working in conjunction with the site promoters to agree cost/value inputs to inform development choices based around an agreed priority list; and
(C)	the new policy context for the planning application be provided by a revised District Plan Policy on the Goods Yard, subject to further public consultation, and closely aligned with any emerging Neighbourhood Plan policy for the site.

1.0 Background

- 1.1 The Bishop's Stortford Goods Yard is a centrally located brownfield site bounded by the railway station/line, river Stort, and the town centre.
- 1.2 Current planning policy on the site is set out in the Local Plan 2007, Policy BIS11: The Goods Yard/John Dyde Training College Site. This policy includes a requirement for a mixed-use development including 700 dwellings (200 of which have already been built at the former John Dyde Training College Site) and a Link Road running through the site between London Road and the Railway station. The Link Road proposal formed one of a number of recommendations set out in a study by Steer Davies Gleave in 2006 (see Background Papers).
- 1.3 Since the publication of the 2007 Local Plan, local views on an appropriate approach to development of the site have evolved. These views are encapsulated in a Development Brief produced

in 2011 by the Bishop's Stortford 2020 Visioning Board, comprising the Town Council, District Council, Chamber of Commerce, and the Civic Federation.

- 1.4 In addition, since 2007, the development strategy for the town has also changed, in response to the requirements of the National Planning Policy Framework (NPPF).
- 1.5 One of the key aspects of the development strategy involved a town centre boundary linking the existing town centre with the railway station, to focus efforts on providing an attractive pedestrian circuit with increased footfall to shops and businesses.
- 1.6 The importance of the Town Centre Boundary was articulated in a report by the Leader of the Council in July 2012 (see Background Papers). This stated that within the boundary, 'emphasis should be given to sustainable mixed uses and retail led services/activities'. The Town Centre Boundary was adopted by Full Council on 7 August 2012 as a material consideration in respect of any planning matters relating to the area described.
- 1.7 The draft District Plan, January 2014, articulated the aspirations set out in the 2011 Development Brief, and related these to the development strategy for the District Plan. This was subject to public consultation between February and May 2014. The response from the site promoters, dated 21 May 2014, is available on the Council's website (see Background Papers). This states that *"it is important that the deliverability of the site is not frustrated by undue planning policy constraints"*, and seeks to amend the policy from provision of 200 homes to 'up to 450 homes', and deletion of the reference to a Link Road.
- 1.8 Following receipt of this consultation response, a meeting with the site promoters and transport officers from Hertfordshire County Council was held on 1 July 2014, and the agreed notes of this meeting are also available online (see Background Papers). As reflected in the meeting notes, *"given the limited capacity of the town centre road network and the Hockerill junction in particular, the transport authority was likely to have significant concerns about any proposals which would rely on primary access through the northern end of the site. The transport authority viewed southern access for the majority of the development as essential to maintaining town centre traffic flow unless it can be demonstrated that northern access can be made to work."*

- 1.9 In summer 2014 Peter Brett Associates (PBA) were appointed by the Council to undertake work on a Delivery Study to test the deliverability of the draft District Plan. PBA was requested to extend the scope of the study to include the Goods Yard.
- 2.0 Report
- 2.1 Accompanied by the PBA team, Officers met with Network Rail, Solum Regeneration Ltd (the site developer) and Savills (the planning agents for the site developer), on 10 October 2014. At the meeting discussions were held in relation to transport and viability matters. The site promoters outlined their intention to submit a planning application in September 2015.
- 2.2 Following the meeting, the site promoters set out in writing their view of the Link Road, and these are contained in the letter from Savills, the submission by Mayer Brown Transport Consultants, and the indicative layout showing the route of a Link Road, all contained at **Essential Reference Paper 'B'**.
- 2.3 The Council commissioned PBA to prepare two short reports on the Goods Yard, one addressing financial viability and policy approaches, and the other addressing the Link Road concept and the approach to transport generally. These are contained at **Essential Reference Paper 'C'**.
- 2.4 A meeting was held with the Neighbourhood Plan team on 13 November 2014. A significant part of this meeting involved discussion of the Goods Yard site. The agreed notes of the meeting are contained at **Essential Reference Paper 'D'**.
- 2.5 A meeting was held with transport officers from Hertfordshire County Council on 17 November 2014. A note from the County Council in respect of their main concerns and aspirations for the site is contained at **Essential Reference Paper 'E'**.
- 2.6 All of these documents have been added to the Goods Yard webpage (see Background Papers).

Main Issues

- 2.7 Based on the above meetings and submissions, and taking account of the history of efforts to plan for the site, the main issues relating to the site are as follows:

- A) There is a tension between the aspirations for the site set out in the 2011 Development Brief and requirements for deliverability. This is likely to require agreement to be reached around difficult trade-offs between different aspirations, including affordable housing, housing quantum, mix and density, transport, and aspirations for other uses;
- B) An approach based primarily on highways engineering will not be appropriate, and instead approaches based on public realm enhancements and other 'softer' measures should be investigated, in order to encourage through-traffic from the south in particular to re-route onto the existing town bypass, and free up capacity for trips with the town centre as the destination;
- C) Related to this, the Link Road proposals should be recast as a sustainable transport corridor, providing for pedestrian, cycle and (subject to further investigation) bus access, rather than as a route for private cars (except insofar as will be needed to access the site);
- D) There appear to be strong grounds for framing the policy approach to the site in terms of its enhanced function as a transport interchange, in particular looking at bus, cycle, and pedestrian linkages, and linking the site more closely with the town centre strategy and the bus network.

The Way Forward

- 2.8 PBA has advised that, given the complexity of the financial viability issues around the site, and the timing of the planning application, masterplanning and design should be led by the site promoter, since small changes to the masterplan can have large implications for viability and deliverability, and this process can be opaque to third parties not directly involved in the commercial aspects of scheme delivery.
- 2.9 However, given the importance of the site, both in terms of local community aspirations and its wider strategic role, it would not be appropriate to provide the degree of flexibility requested by the site promoters in their response to the District Plan consultation.
- 2.10 Close partnership working between the site promoters and County, District, and Town Councils, is recommended, through the existing Neighbourhood Plan group, in order to ensure that closely aligned draft District Plan and Neighbourhood Plan policies can be agreed, to provide a clear, consistent, and deliverable framework to guide the expected planning application.

- 2.11 Recognising the critical role of financial viability in this process, it is proposed that the District Council should appoint viability consultants to review emerging evidence from the site promoters, and advise the Council and the Neighbourhood Plan group on the implications of this for emerging policy. The critical period for this work will be during January to March 2015, when the site promoters have indicated that their viability consultants and architects will be working on the scheme.
- 2.12 In the lead up to this, the partners will need to reach agreement on a priority listing of requirements for the site, so that this can be used as a tool to enable progress in the event that, as anticipated, it is not possible to meet all the aspirations. It is proposed that this process should be co-ordinated by the Neighbourhood Plan team, working in conjunction with the site promoters, and with assistance from the Planning Policy Team at the District Council as necessary.
- 2.13 Finally, in order to clear the way for a planning application, it is also proposed that the existing Local Plan Policy BIS11: the Goods Yard/John Dyde site, be struck through as no longer providing a suitable framework for consideration of a planning application. Instead, the emerging policies for the District Plan and the Neighbourhood Plan should fulfil that role.

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

- All documents relating to the Goods Yard, including submissions from the site promoters and meeting notes, are on the Council's website at: www.eastherts.gov.uk/preferredoptions2014
- Bishop's Stortford Transport Study (Steer Davies Gleave, 2006) www.eastherts.gov.uk/index.jsp?articleid=15659
- Bishop's Stortford Goods Yard Development Brief (July 2011) www.eastherts.gov.uk/index.jsp?articleid=12735
- Report to Executive by the Leader of the Council: Bishop's Stortford Town Centre Boundary Proposal (10 July 2012)

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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:	As outlined in the report, consultation was undertaken with the Neighbourhood Planning Team, Hertfordshire County Council, and the site promoter. In addition, consultation was undertaken with the Leader, Chief Executive, and Director of Neighbourhood Services.
Legal:	None
Financial:	Budget will be required to enable the viability assessment of the site promoter submission.
Human Resource:	Officer time in engagement with the Neighbourhood Plan
Risk Management:	Failure to satisfactorily address the issues outlined in the report could lead to disjointed approach to the planning application, resulting in sub-optimal development outcomes.
Health and wellbeing – issues and impacts:	The link between planning and health has been long established. The built and natural environments are major determinants of health and wellbeing.

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31 October 2014
Link Road 3121014



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Dear Sir

Bishop's Stortford Goods Yard site

Further to our various discussion, we are writing in connection to the Goods yard site and the draft Local Plan policy which relates to it (Policy BISH 3).

In our representations dated 21 May 2014 (copy enclosed) we argued that the potential need for a link road through the site should be removed, and that the issue of access and the effectiveness of the station transport interchange should be dealt with through masterplanning and a transport assessment which will accompany the planning application. The purpose of this letter, and the attached technical note from Mayer Brown which summarises some of the issues that the link road would raise from a transport planning point of view, is to provide further information in this regard, so that the District Plan Executive Panel can consider the issue further at the District Plan Executive Panel meeting on 8 December.

In our view there are a number of shortcomings associated with the provision of a link road, if one were to be provided. With these in mind the need to consider the provision of a link road will frustrate the masterplan process, which in turn will endanger the overall quality of the development scheme and the station interchange. These are set out below.

1. It is not clear how the provision of a link road could be incorporated successfully into an effective transport interchange at the station. In particular, it is likely that pedestrians travelling to the station from the goods yard site and the town centre would need to cross the new road in order to get to the station. It could also add to traffic congestion at the station forecourt. Please see paragraphs 4.4 to 4.6 of the accompanying note by Mayer Brown which explains this issue in more detail.
2. We understand that the cost of the road could be in the region of £4.5 million. In the absence of funding from another source, or alternatively increased density to drive enhanced value, this is a potential development cost which will reduce the land value of the development, and which will impact upon viability. This is likely to mean that it will not be possible to provide (for example) affordable housing or other planning benefits which the scheme might otherwise be able to support.
3. If the Link Road, were to have any meaningful highways benefit, commensurate with its cost, we consider that it will both compromise the quality of the interchange, particularly the residential environment, in particular in relation to noise and severance. This is a sustainable site in close proximity to the town centre and the train station, and the provision of a road through the site will be inconsistent with the principles of providing an attractive, pedestrian and cycle friendly environment.

4. Even from the initial illustrations prepared by Mayer Brown, it is clear that the road would involve a significant land take. This will reduce the amount of land that is available for development, with a new environmentally sensitive edge on the east side adjacent to the road where it would be difficult to provide good quality residential outlook with a safe child-friendly public realm. This will be demonstrated in more detail a further plan which shows a potential layout for a link road, and how it would impact upon the developable area of the site (to follow).

A link road might bring some benefits in terms of the operation of the London Road/Station Road junction, and to some extent in relieving some congestion from the London Road. However we feel that these modest benefits are outweighed by the concerns which I have outlined above, which calls into question the overall wisdom of retaining the link road as an 'option' for the site.

Solum Regeneration is in the process of appointing architects to produce a masterplan for the site, which will lead up to the submission of a planning application in September 2015. If it becomes necessary to retain the possibility to include a link road, this will frustrate the masterplaning process as it will be necessary to produce two alternative options for the site; one with a link road and one without. We feel that the good planning of the area would be best served if the link road option were to be deleted altogether at this stage, which would enable the masterplanners to proceed with confidence to produce a plan for a high quality development at the site.

In earlier discussions, you have asked us to confirm the position regarding the status of the site as a freight yard. We are advised by Network Rail that the development of the Bishops Stortford site was previously constrained in that, due to regulations affecting Network Rail owned freehold land, when the DBS lease was surrendered it would have automatically been placed onto the "Supplementary Strategic Freight Site List" (SSFSL).

Rail freight operators that meet a certain criteria can call for a new lease to be granted to them of any site which is on the SSFSL.

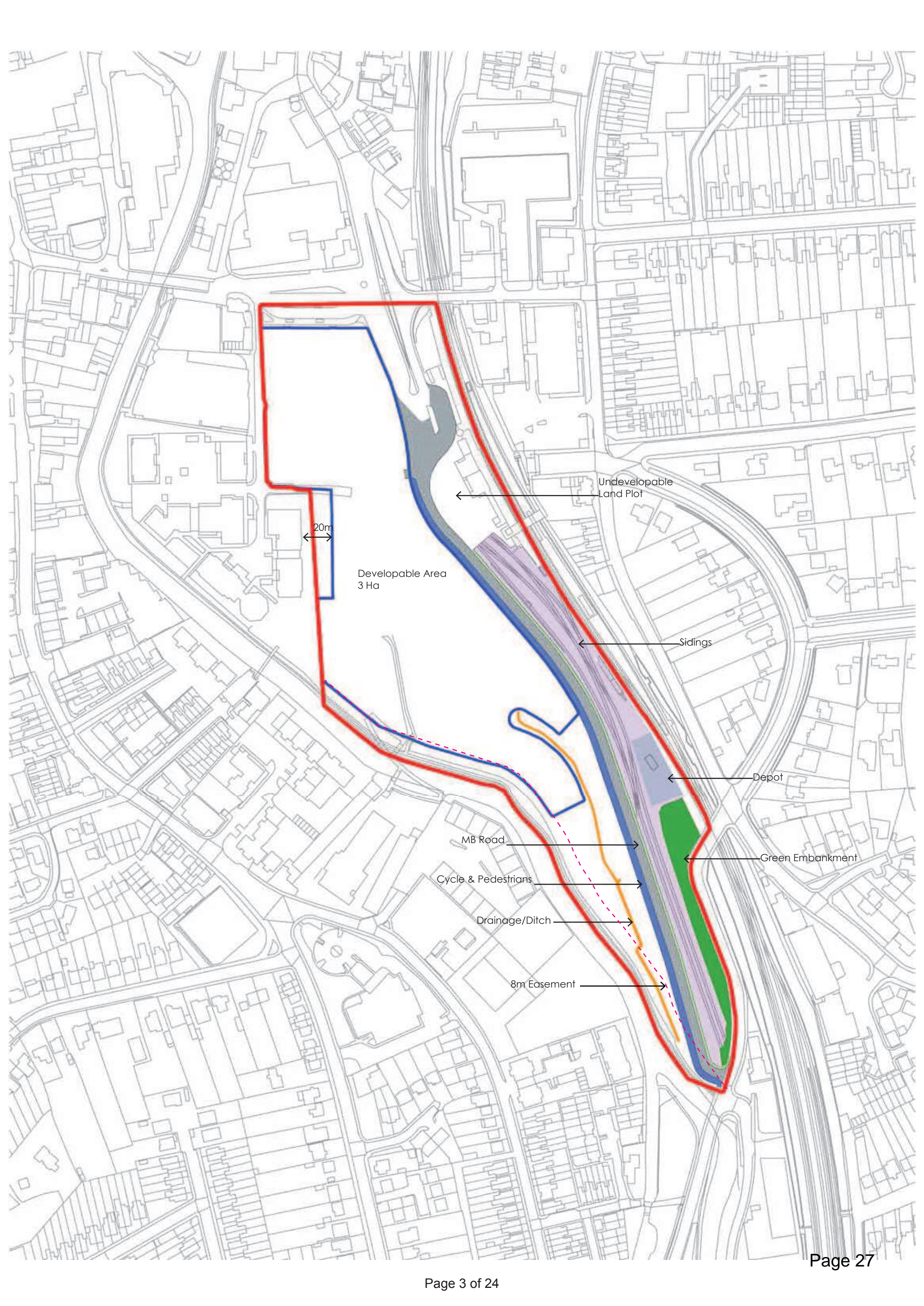
Following recent discussions with the relevant freight operators it has been agreed that there is no current or reasonably foreseeable (or realistic) future rail freight demand for the town centre site and the operators have formally signed off that it is not appropriate for the site to be placed on the SSFS.

I trust that this is acceptable.

Yours sincerely

Nick Green
Director

Enc Local Plan representations
 Mayer Brown technical note
 Link Road drawing (to follow)





**SOLUM REGENERATION
BISHOP'S STORTFORD STATION
BISHOP'S STORTFORD, EAST
HERTFORDSHIRE**

**TECHNICAL NOTE REGARDING THE
PROVISION OF THE GOODS YARD LINK
ROAD**

OCTOBER 2014



**SOLUM REGENERATION
BISHOP'S STORTFORD STATION
BISHOP'S STORTFORD, EAST
HERTFORDSHIRE**

**TECHNICAL NOTE REGARDING THE
PROVISION OF THE GOODS YARD LINK
ROAD**

OCTOBER 2014

Project Code:	SolumBStort.1
Prepared by:	EC
Approved by:	IM
Issue Date:	October 2014
Status:	FINAL

**Solum Regeneration
Bishop's Stortford Station
Bishop's Stortford, East Hertfordshire
Technical Note regarding the Provision of the goods yard link road**

List of Contents

Sections

1	Introduction	1
2	Existing Mode of Travel	2
3	Principals of the Interchange Provision.....	5
4	Issues and Safety Concerns Associated with Providing a Goods Yard Link	8
5	Conclusion	12

Figures

Figure 1.1: Site Location	1
Figure 2.1: Catchment Areas for Car Drivers Traveling to the Station.....	3
Figure 2.2: Catchment Areas for Car Passengers Traveling to the Station	4
Figure 3.1: Twickenham Station.....	6
Figure 3.2: Walthamstow Station	6
Figure 3.3: Epsom Station.....	7
Figure 3.4: Guildford Station	7
Figure 4.1: Issues with Providing a Goods Yard Link	9
Figure 4.2: Issues with Providing a Goods Yard Link (Detailed).....	10

Tables

Table 2.1: Existing Mode of Travel Data (adjusted for other responses)	2
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1 Introduction

- 1.1 This Technical Note has been prepared on behalf of Solum Regeneration to assess the implications of a Southern Access to the proposed redevelopment of the Goods Yard Site at Bishop's Stortford Station. The location of the proposed development is shown in **Figure 1.1**.



Figure 1.1: Site Location

- 1.2 In particular this Technical Note:
- Firstly provides an understanding of existing travel patterns to and from Bishops Stortford Station
 - Secondly considers the principals, that would form part of the Interchange Design
 - Concludes, by considering the role of The Goods Yard Link, set against those objectives.

2 Existing Mode of Travel

National Rail Travel Survey (NRTS) Data

- 2.1 National Rail Travel Survey (NRTS) Data has been obtained for Bishop's Stortford Station. **Table 2.1** shows the existing mode of travel to the station by passengers.

	Mode of Access	Mode of Egress
Walked	63%	64%
Bus/Coach	5%	4%
Car (parked)	16%	17%
Car (dropped off)	9%	9%
Motorcycle	0.25%	0.31%
Bicycle	2%	2%
Taxi	5%	5%

Table 2.1: Existing Mode of Travel Data (adjusted for other responses)

- 2.2 The NRTS Data shows that of the users of Bishop's Stortford Station, around 63% walk and in total around 75% travel to and from the Station by non-car means.
- 2.3 The bus modal share is considerably lower, than other station interchanges, showing the potential to increase this modal share through improved interchange.
- 2.4 What is clear from the NRTS data, is that non-car users make up the majority of current users of Bishop's Stortford Station and as with other Solum Regeneration proposals, the focus of using available space to increase further the number of trips by non-car means is likely to achieve a wider traffic benefit.

Catchment Areas

- 2.5 Using GIS we have considered the origin of rail users who travel to and from the Station by car, for people who either drive and park at or near Bishops Stortford Station, or car passengers who are dropped at the station.
- 2.6 It can be seen that a high percentage of people currently travelling to Bishop's Stortford Station by car originate from relatively local destinations, and consequently it is reasonable to consider that an improved non-car mode interchange at the Station would convert some of these trips to non-car mode means of travel, such as via bus or cycle. This is illustrated in **Figure 2.1** and **2.2**.

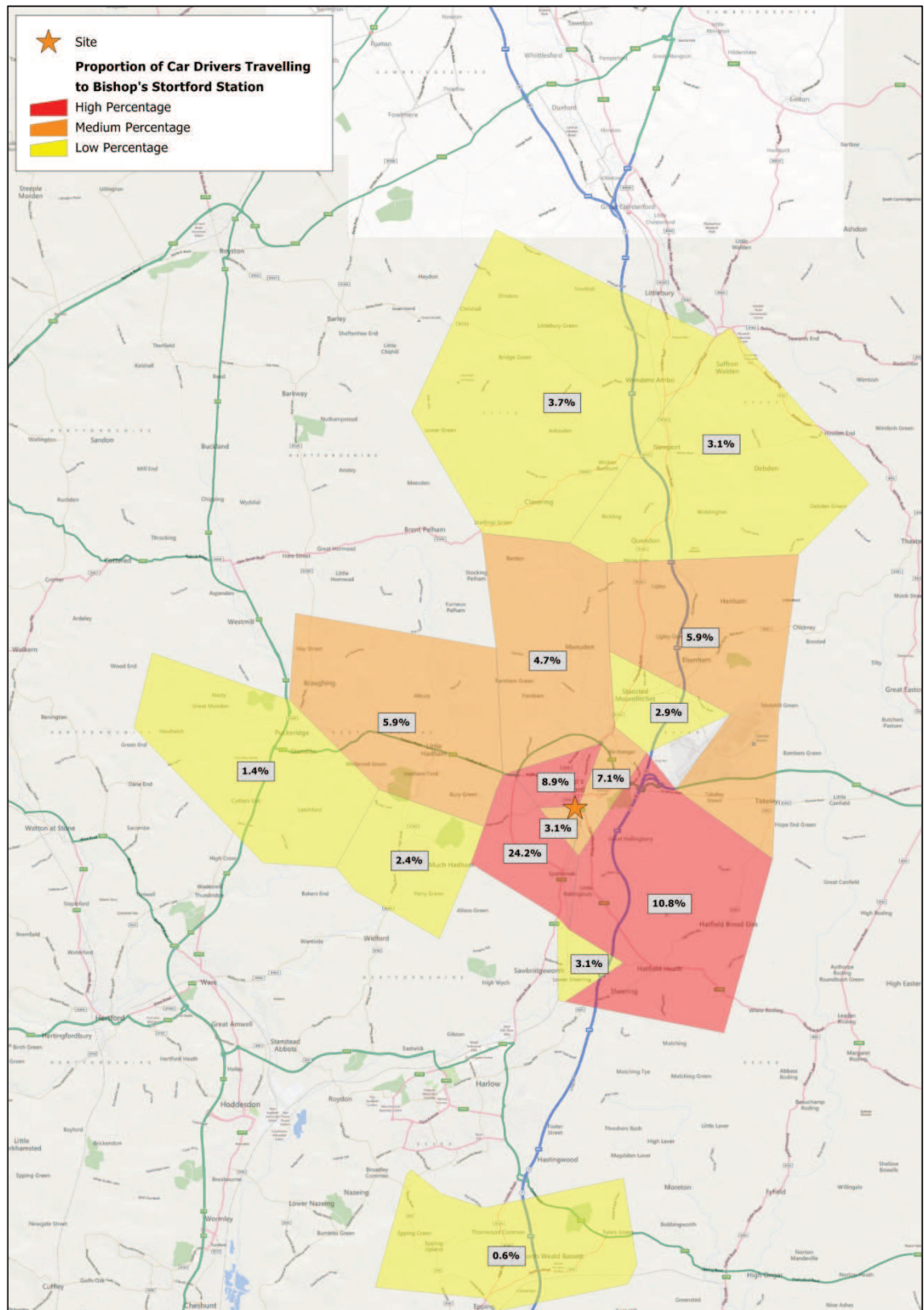


Figure 2.1: Catchment Areas for Car Drivers Traveling to the Station

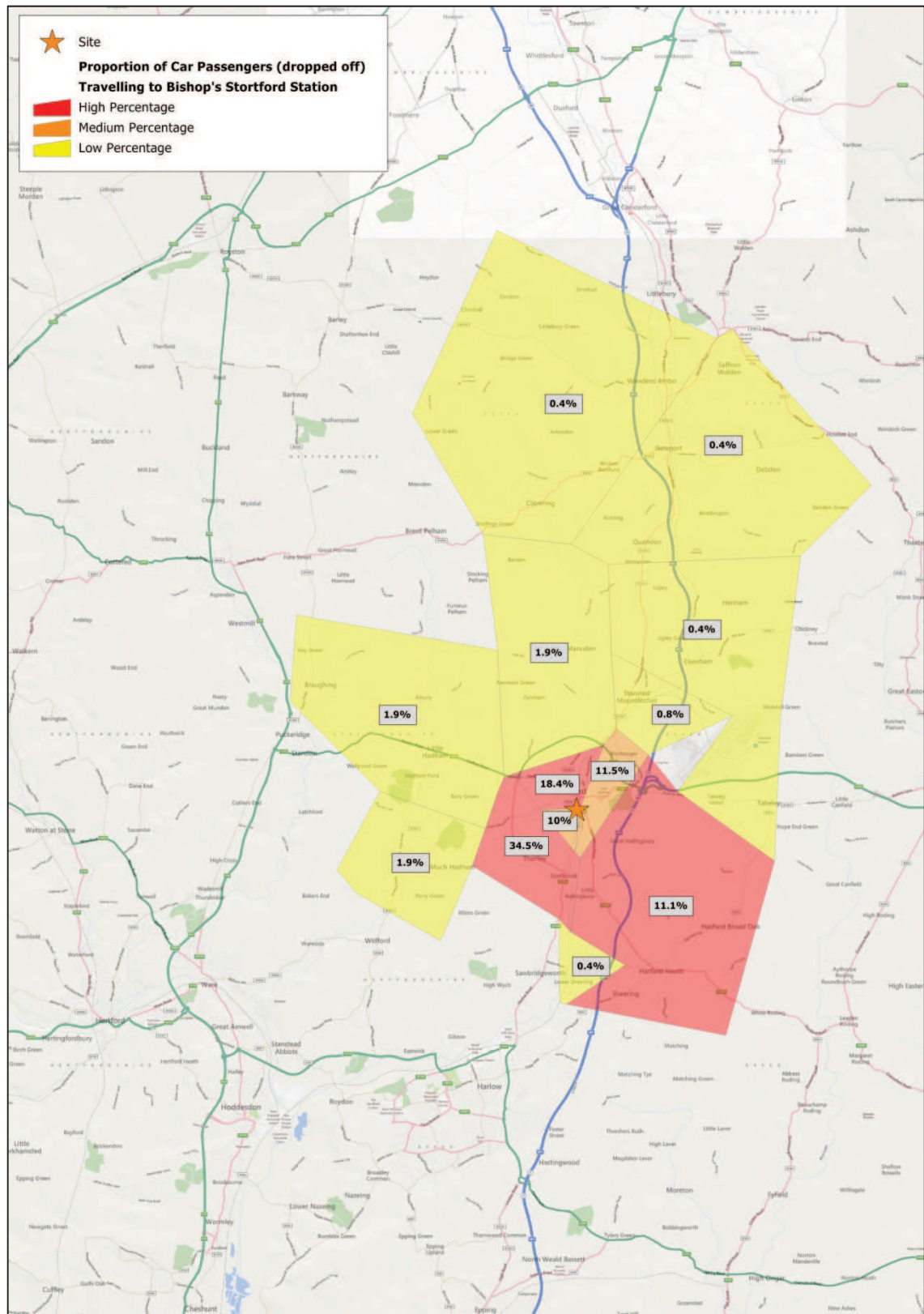


Figure 2.2: Catchment Areas for Car Passengers Traveling to the Station

3 Principals of the Interchange Provision

- 3.1 Solum Regeneration will be instructing Architects to prepare a Master Plan, for the Station and Proposed Development.
- 3.2 For all the Solum projects the mode of travel to the station has been considered, and in all cases the non-car modal share has been in excess of 70%, as is true for Bishop's Stortford Station. In that context, as can be seen in the examples below, the priority has been to provide additional interchange capacity for non-car modes.
- 3.3 Rail industry projections consider that growth in rail travel might be in the order of 2% per annum. Consequently, in order to meet those growth forecasts in terms of accessibility to and from the station, it becomes essential that the philosophy of interchange proposals is to give maximum priority to non-car modes, whilst recognising the statutory requirements in terms of provision for access by vehicle modes.
- 3.4 Some examples of current Solum's station schemes are shown in the following figures and include:
- **Figure 3.1** - Twickenham Station (Greater London)
 - **Figure 3.2** - Walthamstow Station (Greater London)
 - **Figure 3.3** - Epsom Station (Surrey)
 - **Figure 3.4** - Guildford Station (Surrey)



Figure 3.1: Twickenham Station



Figure 3.2: Walthamstow Station



Figure 3.3: Epsom Station



Figure 3.4: Guildford Station

- 3.5 Each of these schemes, has given priority to the non-car modes above the vehicle modes, whilst recognising the Statutory requirements. It is clear that any consideration of the Goods Yard Link Road proposal, needs to consider whether it actually assists with that objective.

4 Issues and Safety Concerns Associated with Providing a Goods Yard Link

- 4.1 Whilst it would require considerable design development to provide full design drawings, the principal of a Link from London Road through the site connecting to Dane Street, is illustrated in **Figure 4.1** overleaf, with a more detailed illustration of the Link Road in the context of the Station Interchange shown in **Figure 4.2**.
- 4.2 This illustrates a 7.3m wide road running from either a roundabout or signalised junction on London Road, through the site to connect with Dane Street.
- 4.3 It is estimated that such a Link would cost in the order of £4.5 million, including junctions and development costs.

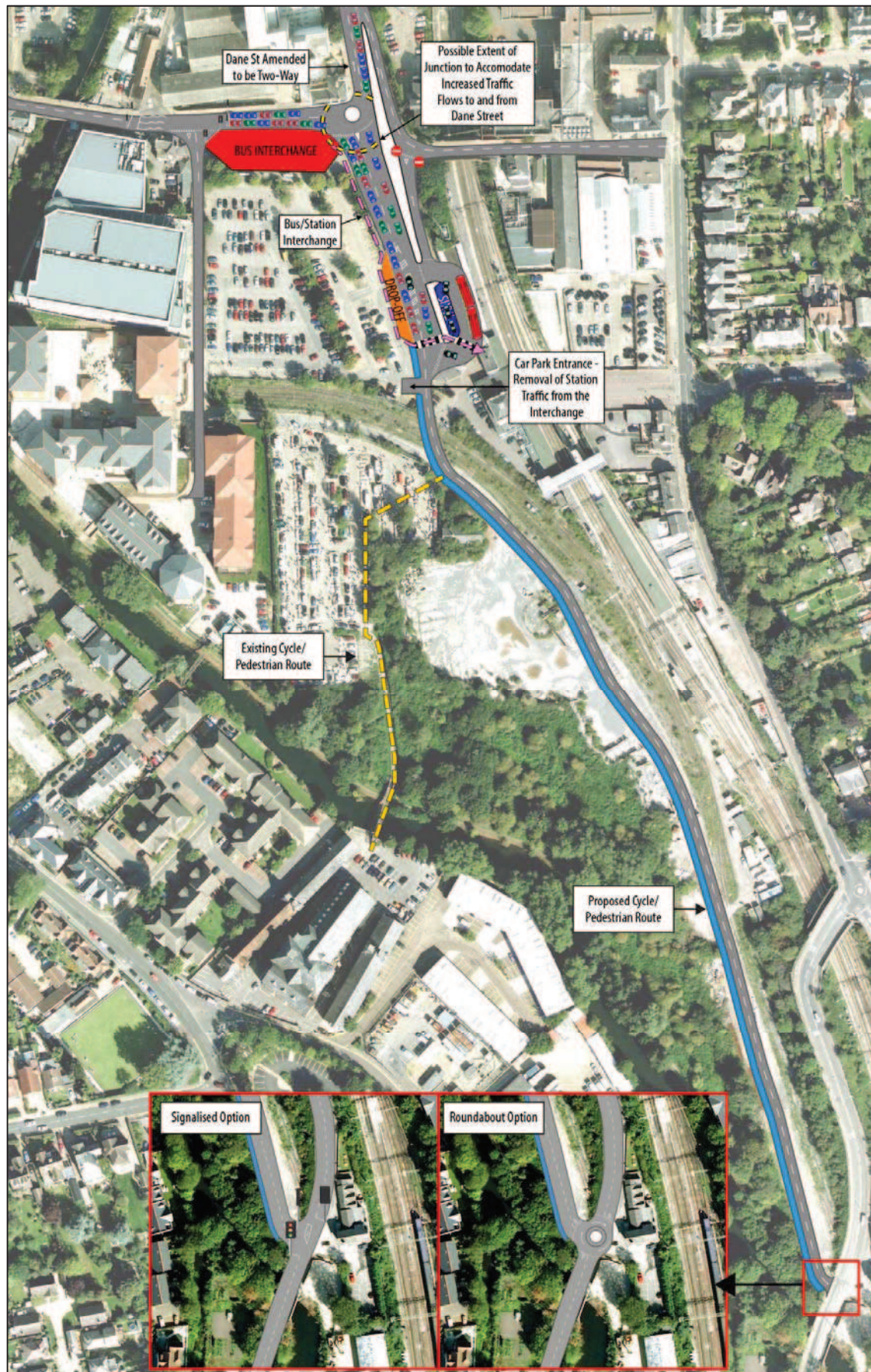


Figure 4.1: Issues with Providing a Goods Yard Link

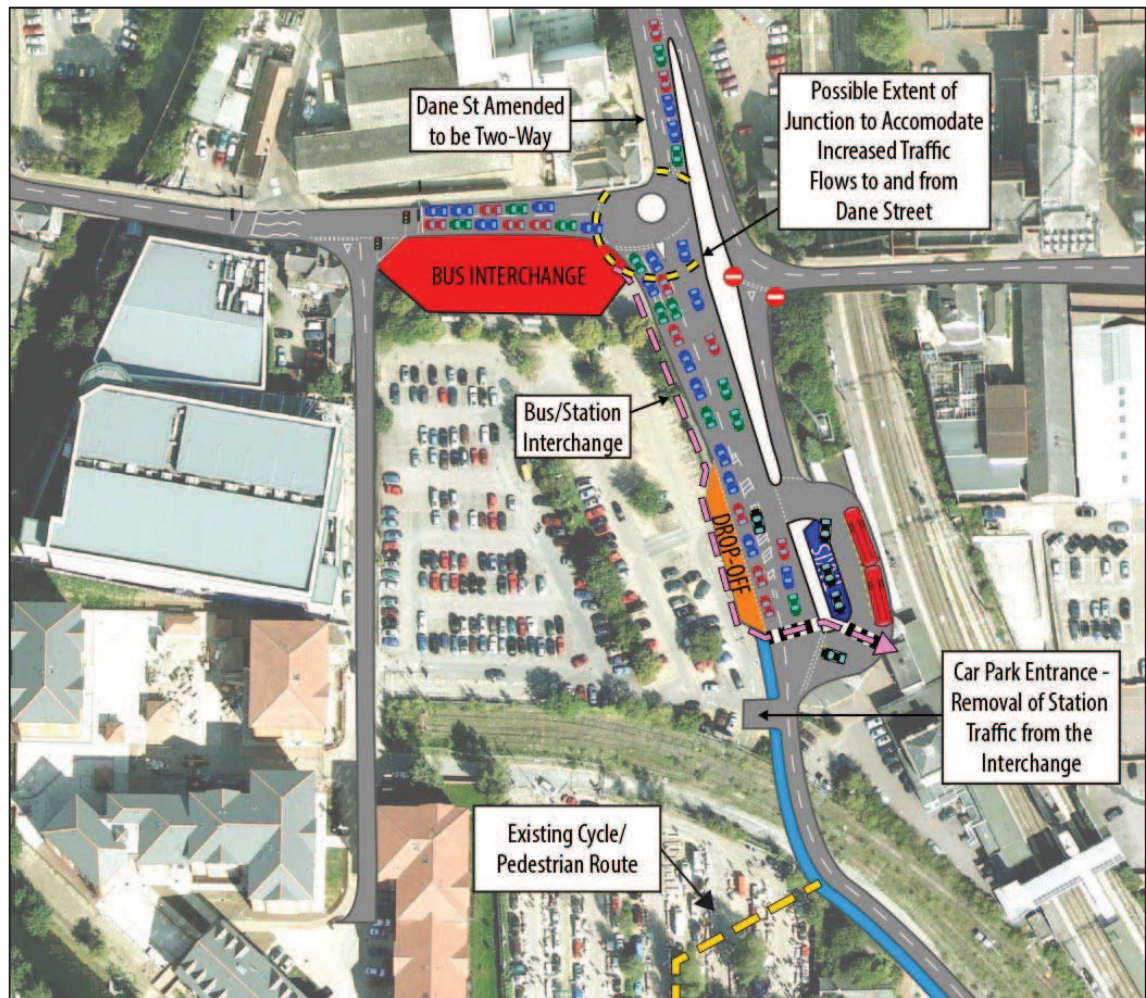


Figure 4.2: Issues with Providing a Goods Yard Link (Detailed)

- 4.4 It is clear that if the Link was to have any meaningful role, in terms of transferring traffic from the central part of the highways network in Bishops Stortford, that it would be required to bring a significant amount of traffic movements to the immediate area in front of the Station.
- 4.5 From considering **Figure 4.2** above, that the provision of such a Link, is likely to impair the ability to provide a high quality interchange, which focuses on enhancing the ability to access the Station by non-car means, in particular:
- i) The existing ramps from Station Road mean that a number of movements by foot and by cycle would be focused on a single crossing point outside of the Station. Whilst this occurs at a number of Stations due to their historic design, this is clearly detrimental to pedestrians and cyclists in terms of safety and severance, compared with creating an environment which involves crossing a quieter road serving only the Station.

- ii) With the provision of a crossing outside of the Station, clearly it will need to be a formal crossing, which would negate certain of the highways benefits from the provision of the Goods Yard Link Road.

4.6 In conclusion, the provision of a Goods Yard Link Road, which would seek to bring significant volumes of traffic to the immediate area in front of the Station, to have any value commensurate with its cost, would seem to be incompatible with the objective of improving the interchange, to encourage travel by means other than the private car.

5 Conclusion

- 5.1 This Technical Note has been prepared on behalf of Solum Regeneration to assess the implications of a Southern Access to the proposed redevelopment of the Goods Yard Site at Bishop's Stortford Station.
- 5.2 When considering the trips made to and from Bishop's Stortford Station, it can be seen that approximately 75% of station users travel by non-car means. Consequently, it is prudent to ensure a safe and effective interchange arrangement is in place at the Station, in order to further encourage users to travel by non-car means. This improved interchange is of high importance, in keeping with Solum Regeneration's aims and ethos.
- 5.3 Whilst the provision of a Goods Yard Link may provide some highways benefits within the centre of Bishop's Stortford, it is clear that the provision of a Link which carries any meaningful quantum of traffic, is not readily compatible with a strategy which seeks to encourage an increased number of trips to and from the Station, by means other than the private car.
- 5.4 Therefore, it is recommended that the Policy requirement for the redevelopment of The Goods Yard site to provide a Goods Yard Link Road.



21 May 2014

Planning Policy Team
East Herts Council
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The Savills logo consists of the word "savills" in a lowercase, sans-serif font, colored red, set against a solid yellow rectangular background.

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Dear Sirs

**EAST HERTS DRAFT DISTRICT PLAN PREFERRED OPTIONS CONSULTATION
Site/Policy BISH 3; Bishop's Stortford Goods Yard**

Thanks you for providing us with the opportunity to engage in East Herts District Council's Preferred Options District Plan consultation.

We are writing on behalf of Solum Regeneration in relation to the Bishop's Stortford Goods Yard site, which is identified for development in the draft District Plan as Site BISH3. Solum Regeneration is a joint venture partnership between Network Rail and Kier Developments, which would manage development proposals for the site.

Overall

The site is owned by Network Rail and one of the key objectives is to deliver a new rail / bus interchange facility as part of the site's development, together with other station improvements including improved rail passenger parking facilities. This should be recognised within the draft policy.

We are pleased to note that Bishop's Stortford is recognised in the draft District Plan as one of the key towns in which development is to be focused, and that in accordance with draft Policy BISH1 (Development in Bishop's Stortford), significant numbers of new homes are to be accommodated within the town.

Draft Policy BISH3 (The Goods Yard) recognises the Goods Yard site as occupying a strategic location between the railway and the town centre. Whilst we fully support the general thrust of the allocation, we have a number of comments, particularly in relation to the timing for the delivery of the site, and in relation to the mix of uses and the form of the development that could be provided.

Generally speaking it is important that the deliverability of the site is not frustrated by undue planning policy constraints, and we provide comments in relation to the draft site specific policy as follows in this letter.

The site may also need to be delivered in a phased manner, which will be partly influenced by the operational requirements of Network Rail and the Train Operating Company, and the need to remove redundant infrastructure.

Land Use

We support the allocation of the site for significant mixed use redevelopment. However, we consider it important for the policy to be worded in such a way that it incorporates sufficient flexibility for appropriate uses to come forward in line with needs and market demands. Any development needs to be viable before it can

be delivered, and there should be no reason why a variety of town centre uses would not be appropriate for the site.

Residential Development

On the basis of the high accessibility of the site to both the railway station and the town centre, we consider the designation of the site for only 200 residential dwellings to comprise a missed opportunity to optimise its development potential and to *“boost significantly the supply of housing”* as sought by national planning policy. This is also significantly less than the saved Local Plan (2007) Policy BIS11 allocation for the Bishop’s Stortford Goods Yard site (along with the former John Dyde Training College site, Anchor Street), which identifies the site as having the capacity to deliver a minimum of 700 residential units.

This is a brownfield site within the town centre, and best use should be made of it to relieve pressure on Greenfield sites. We therefore recommend that the policy should be amended to promote a higher density of residential development at the site. Initial feasibility assessments indicate that up to 450 dwellings could be delivered at the site and policy should be amended to reflect this.

We note the draft policy’s reference to 3-4 bedroom family homes to the southern end of the site (Policy BISH3 (a)). We are concerned not to unduly restrict development proposals on this highly accessible town centre site and would suggest instead that this requirement is deleted and the approach is instead covered by Policy BISH3 (b) which seeks to ensure that a range of dwelling types and mix is provided.

Where there is strong market demand for the provision of smaller dwellings due to the site’s accessible location, this should not be resisted.

Mix of Uses

To ensure maximum flexibility for this key site in coming forward, we would support a broad reference to a range of non-residential uses which might be included in the development in the draft policy, without necessarily setting out specific requirements. This would include:

- retail;
- retail foodstore;
- office;
- medical centre / dentist / crèche;
- care home; and
- hotel.
- Leisure uses

Solum appreciates the requirement to further explore the feasibility and viability of these uses during the course of pre-application discussions. The policy should, however, be reworded so as not to unduly restrict the type and quantum of development that can come forward on the site.

Local agents, for example, have not identified a requirement for a *“significant amount of B1a floorspace”* as currently sought by the draft policy. More significant provision of retail uses is, conversely, considered wholly appropriate, especially at the northern end of the site which falls within the town centre boundary. This would help to establish the viability of the scheme as a whole.

Urban Design

The applicant notes the requirement for a conceptual masterplan to be submitted alongside any planning application and can confirm architects will shortly be appointed to review initial scheme feasibility options. We would be happy to share these with officers as they progress. However, we have concerns about the requirement in the draft policy for development to enshrine the principles set out in the 2011 Planning Brief for the site. This document will be significantly out of date by the time a planning application is submitted for

the site and whilst it will doubtless be a material consideration, we feel it is unhelpful to constrain the scheme by setting out a policy requirement to link it to an out of date document.

Delivery

With regards to timings, we note that the draft policy expects development to come forward between 2021 and 2026. We would, however, like to ensure that the policy is worded so as not to frustrate development which has the ability to come forward earlier than anticipated.

When we last wrote to officers in relation to the site in September 2012, we advised that the site was designated as a Strategic Freight Site and that DB Schenker had a long lease on part of the site for freight use. The site's de-listing as a rail freight site commenced in 2012 and is now nearing completion so can be brought forward much earlier than the had previously been anticipated. We expect it to be likely for development to come forward within the next five years so would like to see the policy changed to reflect this.

Viability

Viability will be a key issue in ensuring the delivery of this key site. There will be a need to balance the provision of an integrated transport hub and improvements to the public realm surrounding the station with the delivery of commercial development.

Policies within the emerging District Plan should be worded to incorporate sufficient flexibility to reflect the viability and deliverability of individual schemes. Planning obligation requirements should not seek to increase the financial burden on schemes beyond which they can viably afford. This could otherwise frustrate delivery of much needed regeneration and could delay the delivery of other planning benefits associated with new development.

Other Comments

With reference to other paragraphs in the draft policy:

g) Whilst the reference to pocket parks may be appropriate in some circumstances, we feel that that it would be overly prescriptive to set this out as a requirement of policy before the masterplan and the mix of uses has been determined. At this stage it would be better to include a requirement to include "high quality public spaces" which ought to be sufficient to set a framework for the public realm strategy to come forward.

h) The reference to the "direct route" to the bridge should be removed; whilst it would be reasonable to provide a route, having a direct route may constrain the masterplan unnecessarily.

i) It is not reasonable to require any decentralised energy system to use locally sourced fuel. This represents an unreasonable restriction and it should be deleted from the policy.

j) The reference to the "area of woodland to the south of the site" in sub paragraph j) is confusing. Although there are trees on the site there are no woodland areas as such, and this should be clarified.

III) We feel that it is unnecessarily prescriptive to set a limit on the height of buildings fronting the river, or anywhere else on the site. This may constrain designers to an unacceptable degree and could encourage a lower quality, bland design approach which is devoid of variety in heights and massing and of visual interest. Instead, we feel that the policy should encourage an approach which is sympathetic to the surroundings.

IV) It is unhelpful to include a blanket requirement for site parking to be "minimised". For example the station car park will need to be of an appropriate capacity, and certain uses will need appropriate levels of parking in order to be viable and attractive to occupiers. We would recommend that the word "appropriate" is used instead.

V) We feel that the reference to the need for a link road should be deleted. A full Transport Assessment will be carried out as part of any planning application submission, including modelling as appropriate, which will assess the need for appropriate necessary mitigation.

Proposed Changes to Policy BISH3

We set out below our proposed amendments to draft Policy BISH3 for your ease of reference.

BISH3 The Goods Yard

I. The Goods Yard will provide for up to 450 200 homes between 2016 and 2021 2021 and 2026, as part of a mixed use development including a new passenger interchange and enhanced station facilities including multi storey passenger car park, including a significant amount of B1a office floorspace and small scale retail provision. Development of the site may need to be phased and shall include:

- (a) A mixture of residential apartments on the upper floors of commercial employment uses and 3-4 bed and family homes to the southern end of the site. Other uses considered suitable as part of a mixed use development are retail uses of an appropriate scale, employment uses, care home, medical uses, a hotel and leisure uses;
- (b) a range of dwelling type and mix, in accordance with the provisions of Policy HOU1 (Type and Mix of Housing);
- (c) Affordable Housing in accordance with Policy HOU3 (Affordable Housing), subject to viability considerations;
- (d) active ground floor frontages;
- (e) views and vistas towards the railway station and the river;
- (f) improved access to the waterway from the town centre to create a focus of activity for residents and visitors;
- (g) high quality public spaces, including pocket parks within the site area and in particular along the river;
- (h) a direct route from the station to the Goods Yard pedestrian and cycle bridge;
- (i) a decentralised or District Heating system, or other low carbon heating system for residential and commercial use throughout the development, using locally sourced fuel and with appropriate long term management arrangements;
- (j) landscaping and tree planting to reduce urban heat island effects, including retention and enhancement of the area of woodland to the south of the site;
- (k) necessary new utilities infrastructure;
- (l) planning obligations including on and off-site developer contributions; and
- (m) other policy provisions of the District Plan and relevant matters, as appropriate.

II. The site will be developed in accordance with a conceptual masterplan which shall be submitted with a planning application. This will enshrine the principles set out in the Development Brief (2011) within an overall design code that sets out parameters for design and layout.

III. The height and massing of B buildings fronting the river shall be designed to be sympathetic to the surroundings and to not exceed 3 or 4 storeys in height and should be sufficiently set back to avoid a 'canyon' effect.

IV. On-site car parking will be appropriate minimised, to avoid worsening of town centre traffic congestion and the impact on the Hockerill Air Quality Management Area.

V. Site promoters must work with Hertfordshire County Council as the Highways and Transport Authority to undertake transport modelling to assess the need for a link road through the site, and to assess and provide suitable mitigation measures against vehicular congestion in the town centre.



We trust that the above is of assistance in the preparation of the District Plan. We would like to be kept up to date with progress and look forward to further opportunities to engage. Please feel free to contact Diana Thomson (020 3320 8250) or me in the first instance if you have any queries or if you would like to discuss anything.

Yours sincerely

Nick Green

Director

cc. Gillian Scarth, Solum Regeneration

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ADVICE NOTES

Job Name: East Herts Delivery Study
Job No: 31122
Date: 7 November 2014
Prepared By: Shilpa Rasaiah, PBA
Subject: **East Herts Delivery Study – Bishop’s Stortford Goods Yard
 - suggested amendments to policy**

Briefing Focus

1. This note sets out some considerations to inform possible amendments to the Bishop’s Stortford Good’s Yard policy, to guide the mix, scale, and quantum of development aimed at encouraging the delivery of this important strategic site and secure wider regeneration benefits.

Why has the re-development of this site not come forward any sooner?

2. We are informed via Savills acting on behalf of the site owner Network Rail, that the main reason for the delay in this site coming forward has been the site’s status as a freight yard designation.
3. We are informed that the release of the site was constrained due to regulations affecting Network Rail owned freehold land. When the DBS lease was surrendered it would have automatically been placed onto the “Supplementary Strategic Freight Site List” (SSFSL).
4. Rail freight operators that meet a certain criteria can call for a new lease to be granted to them of any site which is on the SSFSL. Following recent discussions with the relevant freight operators it has been agreed that there is no current or reasonably foreseeable (or realistic) future rail freight demand for the town centre site and the operators have formally signed off that it is not appropriate for the site to be placed on the SSFS.
5. Network Rail is now keen to progress the redevelopment of this site and have met with officers and PBA to consider requirements to inform the masterplanning of this site. A key consideration is how to improve access to this site and also secure wider transportation benefits. A separate note considers the transport aspects of this site.

The site’s primary role as a transport interchange should be formally recognised and enhanced

6. The site performs a vital role as a transport interchange for the wider area, providing some 700 surface car parking spaces, taxi and bus interchange facilities, and pedestrian routes into the town centre. The reason this is successful in acting as an inter-change is because there is a strong and ready demand for car parking from commuters using the railway station.

ADVICE NOTES

7. The primary function of the site should be recognised as one of a transport interchange – any masterplanning should fully assess how this role can be further enhanced as part of wider transportation measures for the wider area. The contribution of this transport interchange to the local economy should not be under-estimated – the car parking generates considerable revenue income for the train operating companies (TOC) in the area, the taxi and bus companies create employment opportunities. There is a legal requirement for Network Rail to maintain the car parking provision for the TOC, so the proposal will have to replace the surface car park with a multi-storey car park for at least 700 spaces.
8. Wider consideration is needed on how the bus and taxi areas should be re-developed as part of a wider town centre transportation strategy. To date, there is no policy to support the enhancement of the role of the site as a transport interchange in policies BISH3, BISH 10 or BISH11 which refer to this site.
9. **Recommendation:** The Local Plan should formally acknowledge this highly important role in policy and in particular seek to enhance the sustainable transport accessibility to this site.

The transport inter-change provides wider economic opportunities for the benefit of the town centre which must be captured in the site master plan

10. The secondary advantage this transport inter-change use is that it provides the potential for generating considerable pedestrian 'footfall' to this part of town– one that presents economic opportunities which should be captured for the benefit of the wider town. The way to achieve this will be by ensuring strong physical linkages and introducing new commercial uses within the redevelopment which helps to 'attract/capture this passing trade and channel this customer base' to stay and spend in the town centre. Indeed this element of the site's potential has been recognised, culminating with the recent formal extension of the town centre boundary to include the northern part of the Goods Yard site as part of the revised town centre boundary.
11. Indeed a pedestrian circuit map in the local Plan (figure 5.9 on page 69) starts to indicate a physical link. **Flexibility should be retained in how this linkage is created**, the key should be to ensure those using the car parks and transport inter-change should be clearly channelled / attracted into the site through a new development offer and then out into the wider town centre.
12. Recommendation: It will be critical to ensure the master plan layout helps to capture this objective of attracting and channelling the transport inter-change customer base through the site and into the wider town centre.

The site has various opportunities and constraints which will inform the masterplan

13. The River Stort has already been recognised in policy BISH 3 the Goods Yard as an asset to the site's location that presents an opportunity for development to front onto the waterfront and create pedestrian linkages to this area. There are a

ADVICE NOTES

number of other features on the site – for instance some of the railway sidings will be required for operational use by Network Rail and will restrict the developable area. There is an existing area of natural planting which will need to be assessed as most of this will be needed to help create a viable development area. This should however, be compensated by incorporating planting and public spaces within the proposed development masterplan.

14. **Recommendation:** Clarity will be required on the scale of developable land area after taking account of constraints and opportunities presented by the site. Realism is needed as to any barriers placed on this site, as there is a need to maximise the developable area to support a viable mix of development that can fund the range of infrastructure that will be needed such as the transport inter-change, the public connectivity with the town centre, and wider strong public transport infrastructure requirements, affordable housing policy requirements, on-site heat generation, etc...Some policy trade-offs maybe needed, and members should be clear about the main priorities to required from this site.

A pragmatic approach to the mix of uses for this site is needed, aimed at creating a modern well functioning transport inter-change and capturing wider economic benefit for the town centre

15. The policy and the 2011 brief for this site set out aspirations for the types of uses, including creating employment (BISH10), residential and commercial employment, affordable housing, and energy generation (BISH3). No guidance is provided on the scale and mix of the various commercial uses in policy; though the 2011 brief does suggest that this site should include a 'small amount of family housing, and a large amount of office space'. The PBA assessment does not consider the quantified capacity / demand from retail or commercial uses for this site to accommodate the different mix of uses. However, some guidance on the type of uses that is likely to be in demand and so possibly deliverable in terms of the overall function and wider aspirations of this site are suggested here.
16. Development will take place and be delivered on the Goods Yard site if there is 'effective market demand' for the type of use provided and this use can generate sufficient value to pay for the development and wider infrastructure costs. Aspirations for this site provide a starting point to guide the mix; however, a degree of market reality is required to ensure this site is deliverable.
17. Given the physical constraints of this site and need for considerable investment to fund a high quality public transport interchange, and wider development costs/ transport infrastructure requirements, the development on this site will also need to ensure that it includes a sizeable floorspace for residential use value generation.
18. This location does not have any strong economies of concentration that would attract a high value stand-alone speculative commercial development, (unless there is an occupier who is specifically looking for this site – if this was the case the site would have been brought forward sooner). The railway station alone

ADVICE NOTES

does not perform this role and there are bigger competing centres for this type of office market nearby. Any office space demand here is likely to be local demand.

19. Consultations with local commercial agents¹ operating in the Bishop's Stortford area suggest that office rental values in Bishop Stortford range from £15 - £18 psf, with a quality provision letting at £17psf (£194psm). We have been informed that recent changes in planning legislation permitting conversion from office to residential use has resulted in the loss of older outdated office stock to residential use, so restricting the supply of available office space. Based on this, local agents consider they could let more space in the town centre. This consultation suggests that there could be scope to include a limited amount of speculative office space as part of the mix of uses for this site, though the main scheme would need to be a residential led development to be commercially viable.
20. Commercial/employment generating uses that are most likely to capture the 'passing trade' from the transport hub, (particularly during the morning and evening peaks) are likely to comprise of uses such as bars/cafes, restaurants, wider support services such as medical health, fitness and beauty centres – these uses are possibly more likely to rent physical space here; however, in terms of value generation for this site, residential (including retirement housing) is most likely to yield the best value returns and so help to pay for the infrastructure costs needed. Any development on this site would need to be biased towards an apartment residential development with active commercial ground floor uses.
21. The type of residential development to be provided will need to be led by a high quality apartment type development, most likely serving a market demand from younger and older residents (without children) who are not dependent on immediate access to schools, but are interested in a quality leisure, retail and cultural offer provided by a highly accessible town centre location. Bishop's Stortford has a number of other more suitable locations planned for family housing with accompanying school infrastructure where the family housing demand is likely to be drawn to.
22. The PBA assessment does not consider in detail the capacity for this site to accommodate the different mix of uses. The policy indicated some 200 homes to be provided on this site, whilst the site owners have indicated a desire to provide up to 450 homes. The master plan iterations will help to inform the final quantum and mix of various uses that can be satisfactorily accommodated on this site. The height parameter included in the policy of three to four story high, will provide a framework for the overall development and will shape density and quantum. This should be left flexible for now until masterplanning layouts and visuals demonstrate what can physically be accommodated on the site.
23. It is important to ensure that planning policy does not stifle development of the site by placing too onerous a burden on development (NPPF para 173 abbreviated).

¹ PBA Developer Consultation workshop held on 10th October 2014

ADVICE NOTES

Recommendation: It is acknowledged that this site plays an important role in terms of the town centre expansion strategy and there is considerable community interest / aspirations for this site. However, in some instances the aspirations for this site may add cost or not help to realise the value which the site needs to in order to be self funding and deliverable. To ensure that planning requirements are sensitive to the impact on viability stemming from the overall 'ask', we suggest that the following actions should be considered:

Interested parties should work with the site promoter and District Council to set out an agreed set of priorities for this site and seek viability and masterplanning responses from the site promoter to demonstrate how these priorities can be delivered and any choices that might need to be made.

Prioritisation should be done in conjunction with Network Rail / SOLUM and their development team, who can provide the cost / value inputs to inform the choices and impact on the master plan layout. For instance, if a reduction in the number of residential units (compared with the 2007 Local Plan) is a key aspiration locally, then the stakeholders should recognise this may impact on the value generated by the site and so should be prepared to consider the implications for other priorities such as the delivery of affordable housing and infrastructure contributions. Some requirements e.g. transport access will have to be met if the development is acceptable.

The site promoter is looking to undertake a masterplanning exercise which will inform a detailed financial viability appraisal, and this may challenge the achievability of some of the aspirations previously expressed in the draft District Plan, the 2011 Development Brief and various other community aspirations.

ADVICE NOTES

Job Name: East Herts Delivery Study

Job No: 31122

Note No: 001

Date: 5th November 2014

Prepared By: Chris Heaney/Elliot Page

Subject: **Bishop's Stortford - Goods Yard Link Road**

1. Introduction

This Note has been prepared by to inform the content of an Addendum Report that Peter Brett Associates has been commissioned to provide for the East Herts District Council (EHDC) for a site referred to as the Bishop's Stortford Goods Yard. The site is identified in the East Herts District Council Preferred Options Consultation District Plan 2014 as being suitable for 200 residential units and other mix uses (Policy BISH3).

This will form an Addendum to the East Herts Delivery Study, and the scope of this Note is to provide additional analysis on the transport impacts arising from the provision, or not, of a new link road running north-south through the site of the Goods Yard development between Station Road and London Road.

2. Background

Historically, the provision of a link road through the Goods Yard site has been considered on a number of occasions with the objective of bringing capacity relief to a number of key junctions within Bishop's Stortford town centre, including the Hockerill Street 4-arm signalised junction in particular. These proposals generally assumed a development of around 700 residential units which is consistent with Policy BIS2 of the East Herts Local Plan 2007.

A Site Development Brief was prepared in April 2004 by East Herts District Council which proposed the provision of a new link road as did the East Herts Local Plan in 2007.

Furthermore, a Transport Assessment was prepared for the development of the Goods Yard in 2005 by Odyssey Consulting Engineers acting on behalf of Barratt Homes. As part of the TA work, Steer Davies Gleave were commissioned to prepare a 'Bishop's Stortford Transport Study' which included detailed modelling tests being conducted on the impacts of the link road and Goods Yard development using the Bishop's Stortford Transport SATURN Model.

Further consideration of the impacts of a link road through the Goods Yard site has now been given by Mayer Brown in a October 2014 'Technical Note regarding the provision of the Goods Yard Link', acting on behalf of Solum Regeneration who are

ADVICE NOTES

one of two Site Promoters to have submitted expressions of interest to EHDC for the development of a new mixed-use development on the Goods Yard site.

These studies have been considered in full during the preparation of this Technical Note and the Mayer Brown Submission is appended to this Technical Note.

3. Bishop's Stortford Transport Strategy (Steer Davies Gleave) Summary

Testing was conducted using the Bishop's Stortford Transport Model (SATURN) in order to assess the impacts of a new link road. Two tests were conducted using a 2008 and 2018 forecast year: a Do Minimum option (without the Goods Yard development or link road) and a Do Something option (with the Goods Yard development and link road).

A number of network assumptions were also made including:

- Conversion of Dane Street into a two-way working.
- Station Road East closed to traffic.
- Redesign of the Hockerill Street-London Road junction - right turns banned from Hockerill Street to London Road and Dunmow Road into Stansted Road; a pedestrian crossing phase added along London Road and Stansted Road.
- Link Road junction between Station Road and London Road with a new 3-arm signal junction on London Road.

The SDG report also proposed a 'Highway Supply Strategy' which included five key objectives. These were:

- Upgrading the A120 bypass
- Completing the bypass to the south-east
- Improving the capacity of town centre junctions (particularly Hockerill)
- Implementing an urban traffic control system
- Implementing a 2-way system along Dane Street.

The objective for "improving the capacity of town centre junctions (particularly Hockerill)" is most relevant to the delivery of a link road through the Goods Yard site and the performance of the inclusion of the network can, in part, be judged against this criteria.

In the AM peak, junction performance improved with average delay reductions on three of the arms on the junction. However, the tests showed an increase on the Stansted Road approach owing to the additional southbound traffic generated by the link road along Stansted Road seeking to access the new link road via Dane Street.

In the PM peak the junction operated worse than in the Do Minimum scenario. Furthermore, the traffic displacement generated by the Do Something scenario led to a worsening of PM peak performance at junctions further west of the Hockerill junction including The Causeway and Hockerill Street.

ADVICE NOTES

From the work previously undertaken it can therefore be concluded that the addition of a new link road did not lead to the satisfactory performance of the Hockerill junction overall or, indeed, to the general network conditions in the town centre. Therefore its inclusion in any future scheme for the purposes of capacity relief has not to date been demonstrated.

HCC have confirmed that the provision of a link through the site has more benefit if the development quantum being considered is higher.

4. Technical Note regarding the provision of the Goods Yard Link (Mayer Brown)

This Technical Note has been prepared by Mayer Brown on behalf of Solum Regeneration and considers the impacts of a new 7.3m wide link road being provided between London Road and Station Road, with access formed off London Road via a new roundabout or 3-arm signalised junction.

Solum Regeneration has industry experience in delivering station improvement schemes including overseeing major projects at Twickenham, Walthamstow, Epsom and Guildford.

The note advises that all four stations experience high levels of non-car mode share amongst passengers accessing the station (in excess of 70%) which is comparable to the 75% observed for passengers currently accessing Bishop's Stortford rail station. In keeping with this, all four stations also gave high priority to access by non-car mode in their station interchange designs.

The Technical Note concludes that:

- The provision of a new link road would substantially impair the ability of the Goods Yard site to provide a high quality interchange for passengers, owing to the significant volumes of traffic a link road would attract coupled with the safety and severance issues this would create for pedestrians and cyclists crossing the link road to access and egress from Bishop's Stortford rail station.
- In order to mitigate this, a formal crossing would be required across the link road adjacent to the station entrance which would, in so doing, be detrimental to peak hour traffic flows along the link road as well as generating potentially significant peak hour vehicle queuing and delay the Dane Street and Station Road approaches. In so doing, much of the highway benefit a link road would be expected to deliver would be eliminated.

5. PBA Conclusions & Recommendations

PBA in its role as advisers to East Herts District Council have considered the transport implications of the inclusion of a link road within the Bishop's Stortford Goods Yard site that would connect London Road in the south with Station Road to the north. This transport review has considered the previous work undertaken,

ADVICE NOTES

incorporates discussion held with the current site promoters and Hertfordshire County Council as the Highway Authority.

From the work undertaken, PBA can provide the following conclusions and recommendations.

A number of studies have been conducted hitherto into the impact and effectiveness of a link road in highways terms as well as its impact on sustainable modes and the ability of the Goods Yard development to deliver an improved passenger interchange facility off Dane Street. It is noted that the construction of a new link road could cost in the region of £4.5m, including junctions and development costs. Against this substantial level of potential cost, it is our opinion that the highway capacity benefits a new link road would bring would only be marginal and would be outweighed by the dis-benefits it would generate.

The dis-benefits include:

- The generation of additional traffic along the Stansted Road corridor at the Hockerill Street junction
- Substantial vehicle queuing and delay on the link road/ Dane Street/ Station Road
- Safety and severance issues for pedestrians/cyclists crossing the link road to access the station
- The detrimental impact a link road would have on the ambitions of the Goods Yard development proposals to deliver an improved passenger interchange on Dane Street.
- Providing additional highway capacity within the town centre is likely to encourage increased traffic into the centre of which a significant proportion is likely to be through traffic with alternative, more strategic route choices available to them.

Therefore and in the context of the above findings we propose that the following are considered as part of any masterplanning for the site:

- Whilst a connection from London Road to Station Road for general traffic is not considered necessary some further consideration should be given to the role a connection could play in connecting the south of the town to the station for pedestrians, cyclists and potentially public transport. This would not provide for the ability for general traffic to use the site as a 'rat run' but would potentially shorten journeys for non-car users accordingly and encourage modal shift.
- We recommend that consideration be given to the potential to provide access to the station car parking from the south rather than from Station Road. In keeping with the evidence presented by the Mayer Brown 2014 Technical Note, which indicated that high levels of car based passengers access Bishop's Stortford railway station from the south and south-east, a connection in this location would potentially deliver reduced traffic impact within the town

ADVICE NOTES

centre, along the Station Road/ Dane Street corridor and around the Station Interchange area.

- If a significantly higher quantum of development is proposed than what is currently assumed in the current East Herts District Council Preferred Options Consultation District Plan 2014 then consideration should be given to reduced parking standards to ensure that the need for a link road is not considered necessary to mitigate development impact. The ratio of parking spaces to development would need to be determined through more detailed masterplanning and transport assessment

**Bishop's Stortford Neighbourhood Plan
(Central, South, All Saints, and Thorley wards)
Charrington's House, Bishop's Stortford
Thursday 13th November 2014, 12noon-3.30pm**

Attendees

Keith Warnell (KW)	Chairman of the Neighbourhood Plan Steering Group, and East Herts District Councillor
Matthew Serginson (MS)	Solum Regeneration Ltd, development partners with Network Rail
Diane Basavaraj (DB)	Neighbourhood Plan – Transport Lead
James Parker (JP)	Chief Executive, Bishop's Stortford Town Council
Rob Francis (RF)	Neighbourhood Plan – Green Infrastructure Lead, representing the Bishop's Stortford Civic Federation
Murray White (MW)	Neighbourhood Plan – Goods Yard lead
Elliot Page (EP)	Transport consultant, Peter Brett Associates
Isabelle Haddow (IH)	Planning Policy Team, East Herts District Council
Martin Paine (MP)	Planning Policy Team, East Herts District Council

Agreed Meeting Notes

1. KW thanked all for attending and explained the structure of the Neighbourhood Plan (NP) team, the various workstreams and the team leader roles. Progress with the NP Questionnaire was outlined. It was noted that the NP group was keen to involve developers in discussions, and that MS was a regular attendee of group meetings.

Transport

2. EP explained that he had been engaged in the role of a 'critical friend' to the Local Planning Authority in relation to the District Plan work. EP was working on a transport 'think-piece' covering the whole District which would be an essay setting out the main issues and recommendations. It would address town centre congestion issues, including some points specific to Bishop's Stortford. Key messages were likely to include the limitations of the approach to highways engineering-led transport schemes, which could have the effect of attracting more traffic into the town and worsening the existing situation. Instead EP

proposed that a better approach was to seek to alter travel patterns, preferred routes and modes of transport. For example, if northbound traffic on the A1184 found the town centre inconvenient due to pedestrianisation or other public realm schemes, it would re-route onto the bypass. RF suggested that pedestrianisation between Station Road and Apton Road was worth considering further.

3. JP asked whether it would be possible to use the transport models for options testing, and RF queried the source of the data. EP explained that a strategic transport model known as VISUM was due to report in the next few weeks and that this would include coverage of Bishop's Stortford. It would be possible to use this for options testing in future, although the model was operated by Aecom on behalf of Essex County Council and the fees needed for each option test need to be factored in. EP cautioned against over-reliance on transport models, which should be seen as one of several tools. He also explained that the timescales involved in plan-making did not allow for exhaustive model runs.
4. MP added that there was an important role for the professional judgement of experienced transport planners, informed by local knowledge, which was why EP had been asked to engage with the NP group. EP had also attended a meeting with the East Herts Association of Parish and Town Councils and following this session a representative of Thorley Parish Council had indicated his intention to provide information to EP via MP.
5. KW asked about some highways engineering concepts, such as a south-eastern bypass and increasing capacity at Hockerill. EP explained that cost-benefit appraisal of these and other expensive engineering-led ideas was unlikely to stack up. A pragmatic approach would be to consider a range of other traffic management measures, including providing opportunities for alternative modes of travel, and seeking opportunities to redesign the urban environment around people rather than the car.
6. JP explained that one of the key concerns was to ensure the continued prosperity of the town centre by diverting through-traffic to alternative routes but enabling people whose destination was the town centre to get there quickly and easily. EP agreed that this was a key part of the traffic-management approach he would be advocating.
7. DB asked whether a town centre masterplan would be helpful. MP pointed to Buntingford Town Council's approach, which involved employing a specialist in public realm, masterplanning and traffic management to draw up proposals for the High Street. This approach could be something that the NP team might wish to consider further, whether as part of the NP itself or in the longer term. The approach was amenable to public engagement, through design workshops for example.

ACTION: NP team to provide succinct list of local transport issues to MP for consideration by EP in the transport 'think piece'. Suggested deadline: **Friday 28 November**.

The Goods Yard Site

7. MW was leading the NP group work on the Goods Yard. There was a strong desire to see the site developed in an appropriate fashion. He proposed a market square/public space in the development. KW suggested that affordable housing and hotel provision should be given careful consideration. Tanners Wharf had successfully managed to attract office uses. At Welwyn Garden City station development had occurred over the railway tracks.
8. MS responded in relation to the commercial viability of some of the suggestions. Tanners Wharf was not comparable with the Goods Yard site and there was a high risk to commercial viability of over-providing office space. There was unlikely to be strong demand for a hotel. A multi-functional public space was being considered, and this could include provision for a market. In the case of bridging over the tracks, the viability would depend on sufficient returns from the shops above to pay for the scheme, as well as sufficient land either side to provide the supporting structure. In this case neither condition was likely to be achievable.
9. MS explained that there had been a meeting with the District Council in relation to the Link Road proposals. A technical note had been submitted which made the case for deleting the Link Road proposals from policy, because of its impact on land-take and pressure on increased densities, and also the compatibility of the road with the operation of the transport interchange. MP had forwarded these ideas to the County Council highways officers and was meeting with them on Monday to discuss further. It was also understood that the County's views in relation to passenger transport access station access would need to be taken into consideration.
10. Another aspect related to access to the development and the station from the south. MS explained that it had been demonstrated that this could be achieved, but the land was tight given the requirements for set-back from the river and the railway line, and Network Rail's operational requirements for land adjoining the southern access point. MP understood from County that existing Section 106 contributions were available to fund the construction of a new foot/cycle bridge alongside the Station Road bridge, to increase safe and convenient connections between the station and the town centre. It was understood that legal matters and discussions with landowners were taking place but County appeared optimistic that a bridge would be provided.
11. MP explained that there were very high local expectations for the site, and it was also considered very important in terms of the strategy for the town and

the need to improve the connections between the station and the town centre. The draft District Plan policy BISH3 tried to capture the aspirations set out in the 2011 Development Brief. A figure of 200 dwellings had been included in the draft policy following earlier discussion with Savills around interpretation of the aspiration in the Brief for a 'limited amount of family housing'. Savills had proposed a range of 200-300 homes as the minimum viable levels of housing for the scheme to be deliverable. Solum had responded to the District Plan consultation earlier in the year requesting more flexibility in the emerging policy, deleting the requirement for the Link Road and removing the proposal for 200 dwellings and replacing this with a suggestion for 'up to 450 dwellings'.

12. MP stated that financial viability was clearly at the heart of preparing a deliverable scheme. Advice had been sought from PBA on both the Link Road and the policy requirements more generally. This would be shared with the NP group. The advice contained some tough messages in terms of the realism of expectations for the site. It also recommended that a priority list should be drawn up, and that the onus be put on Solum to demonstrate why higher levels of development were necessary. MP suggested that the District Council could commission a viability consultant to assess the Solum figures.
13. MS agreed that this approach would be acceptable, and that it would need to take place in January-March 2015, since this was the period when architects and financial viability work would be undertaken, with a view to submitting a planning application in September 2015.
14. KW expressed concern that it might be difficult to prepare a priority list in advance of analysis of all the Questionnaire responses. IH suggested that whilst the responses were important, they were one aspect of the decision-making process and that there was important role for the NP team to take a leadership role and set out its view. Without a clear view of the local priorities then Solum's task in terms of achieving successful outcomes which also achieved the main community aspirations would be more difficult. It was necessary for Solum's proposals to be both commercially deliverable and to reflect local aspirations as far as possible.
16. MW suggested that there might be a role for the focus group to get an early steer on the priorities, and this could also help to point to a way forward. MP suggested that it would also be important for the District Plan policy and the NP policies for the site to be closely aligned, otherwise there was a risk of confusion which would undermine the ability for delivery of a quality development which goes some way towards meeting local aspirations.

17. MP had discussed the site with the Leader of East Herts Council, who was keen to communicate to the NP group that neither he nor East Herts Council wished to impose any particular approach or mix of uses, and he was very keen to seek input from the NP team.

ACTIONS:

MP to write a report to the District Plan Executive Panel on 8 December to recommend an approach to the Goods Yard to capture the above issues and recognising the need for a policy approach which incorporates both commercial viability and community aspirations.

MW to work with MS and lead work on drawing up a list of priorities to inform the financial viability appraisal and design exercise.

Secondary Schools

18. MP stated that the draft District Plan provided a framework for considering possible solutions to uncertainty around secondary schools provision. It would be necessary to achieve greater certainty around this, and in this respect the District Council relied on the stakeholders to agree a way forward. The key stakeholders included the County Council, the schools, and the landowner/developer interests. John Barfoot had been in touch and was apparently talking to Officers at the County Council about this. The key issue was that the schools were seeking a 22ha site south of Whittington Way, whereas Countryside Properties has stated that a maximum of 10ha would be provided. The County Council's position was that land should be safeguarded for future school provision. MP explained that there needed to be greater clarity around the schools' plans within this context. The District Council was reliant on the stakeholders getting together to work out a solution. MP was concerned that this could result in a delay to the District Plan, which would affect the whole District.

ACTION: KW to speak to John Barfoot about the possibility of bringing together the various stakeholders in a meeting to attempt to find a satisfactory resolution.

Community Football Provision

19. MP stated that a number of responses had been received through the District Plan consultation in relation to the need to provide for the aspirations for community football. It was understood that an informal proposal had been received recently for a Clubhouse and associated pitches at land off the B1004 north of Jobber's Wood. In planning terms this land was Green Belt but if a planning application came in it would need to be considered whether the 'very special circumstances' existed to make the proposals acceptable.

20. KW noted that the land lay outside the NP area. There could be concerns about the precedent of allowing development in this location. However it would be necessary to find out more information to see whether it was an issue which the NP could address.

ACTION: MP to provide contact details to KW, who will make further enquiries around the details of this proposal.

East of Manor Links

21. KW stated that he was aware that concerns had been raised by local residents about the developers' proposals to put social housing towards the back of the site, adjoining the existing residential properties. There was also concern that plans were being put forward when the Golf Club land had not been sold to the developer.
22. MP explained that in the interests of transparency submissions from developers were being posted on the Council's website. However, it should be understood that proposals were at a very early stage and would no doubt evolve further. It would be appropriate for the NP to engage with more detailed work on the site, if it were felt appropriate, to help allay the concerns of local residents. MP understood that following the Golf Club AGM earlier in the year the Golf Club Directors had given an option to Weston Homes on the practice ground.
23. KW said that there were also concerns about the density of the development proposals, and that bungalows would be more appropriate as there was a strong demand for these from an aging population. MP explained that low-density development such as bungalows would lead to pressure for further greenfield development in order to meet overall housing needs. MS stated that although he had no interest in this particular scheme, in general he considered bungalows to be unviable, because the sales premium on a bungalow would not compensate for the loss of revenue from the reduced quantum of units. In future he considered that bungalows would be something of a luxury product with the sales price of existing bungalows rising considerably.

ACTION: KW to speak to the lead NP officer on Manor Links as to a suitable approach to this site.

Other matters

24. KW was trying to obtain information about air quality at London Road from the Environmental Health team at East Herts.

25. KW understood that the Brake Brothers site on Dunmow Road could become available. KW asked whether this site would be suitable for inclusion in the NP. IH advised that for plans provide a framework for development, but the situation on the ground is changing all the time. Generic policies could help to steer planning applications, however if the NP team considered that there was a realistic prospect of the site coming forward then it would certainly be open to the team to address this through their work.
26. MP provided RF with a contact at the District Council in terms of further work on the Green Infrastructure side.

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**East Herts District Plan
Transport Note on Goods Yard Site,
Bishop's Stortford
(November 2014)**

**Hertfordshire County Council
County Hall
Pegs Lane
Hertford
SG13 8DN**

1. Introduction

The following has been produced in response to a request from East Herts District Council (EHDC) officers for a note from Hertfordshire County Council (HCC), as the highway authority, on the transport impacts associated with the redevelopment of the Goods Yard Site in Bishop's Stortford and the case for the provision of a new road to improve access to the site.

The note is based on the consideration information that HCC have received from EHDC on Solum Regeneration's proposals for the site, including a letter sent by Savills to EHDC challenging the need for a link road (Oct 2014), together with a technical note from transport consultants Meyer Brown prepared in support of this argument (Oct 2014) and finally a technical note prepared by Peter Brett Associates (PBA) on the Bishop's Stortford - Goods Yard Link Road (Nov 2014).

2. Background

The existing East Herts District Plan states that the Goods Yard site should:

- safeguard the ability to construct a new road linking the junction of Station Road with Dane Street and London Road, and provide land for the same.
- include residential development, with the aim of creating a minimum of 700 dwelling units on the site as a whole.
- include a fully integrated rail and bus passenger interchange and include good pedestrian/cycle links towards the town centre.

EHDC's preferred options consultation document for their emerging District Plan states that the Goods Yard site should:

- provide for 200 homes as part of a mixed use development.
- minimise on-site car parking to avoid worsening of town centre traffic congestion and the impact on the Hockerill Air Quality Management Area.
- Site promoters must work with HCC as the Highways Authority to undertake transport modelling to assess the need for a link road through the site, and to assess and provide suitable mitigation measures against vehicular congestion in the town centre.

It is understood that Solum Regeneration are proposing to bring forward a planning application for the Goods Yard site around September 2015.

3. HCC Views on Transport Needs

HCC have stated during initial meetings on Solum's current proposals that to effectively minimise the disruption to the existing highway network and to ensure safe access and egress from the site, a southern access to the site is essential.

The information that has been received on the proposals to date does not provide sufficient information on the proposed transport impacts or the mitigation measures or access arrangements that are intended to support the development. It is critical that these are clarified at the earliest opportunity.

HCC's views on the transport elements of Solum's proposals are as follows:

- **The level of car parking provision proposed.** The proposals include a 700 space car park to be shared by commuters and residents of the new dwellings. The site currently holds consent for only 200 car parking spaces for commuters, which is also limited to a temporary period of three years (from Spring 2013). HCC question why such an increased level of parking is being proposed for a site in such a sustainable location. HCC's preference would be to see a lower level of car parking provision complimented by comprehensive measures and improvements aimed at supporting increased travel by sustainable transport modes i.e. improved bus services and associated infrastructure and improved cycle and pedestrian routes and facilities.
- **The provision of a new access road.** HCC consider that the proposals should include the provision of a new access road extending from the southern end of the site to the station interchange and believe that this could provide substantial benefits to the site and wider town if it is restricted to use by sustainable modes of transport.

HCC recognise that the case for 'all traffic' link road aimed at relieving congestion in the town, has not been demonstrated in past studies. It is important however that appropriate measures are brought forward to mitigate the impact on sustainable modes of travel that will result from traffic congestion associated with the cumulative impact of proposed development in the town and surrounding areas.

HCC concur with PBA's comments that the new road should be focussed on providing a dedicated connection from the south of the town to the station for buses, cyclists and pedestrians, creating a sustainable transport corridor that shortens journey times for non-car users and actively encourages modal shift.

Such a road would provide meaningful transport benefits which if designed appropriately would enhance the quality of the interchange and enhance the sustainable nature of the site. It would be consistent with the Solum's stated principles of providing an attractive, pedestrian and cycle friendly environment.

Meyer Brown's technical note also recognises the need to focus on using available space to maximise the number of trips by non-car means and that this would in turn deliver wider traffic benefits. It also supports the Solum's stated priority to provide additional interchange capacity for non car modes and to give maximum priority to non car modes. HCC do not consider a new access road would endanger the quality of the development and station interchange.

- **Air Quality Management Area.** The Hockerill junction in Bishop's Stortford is a recognised Air Quality Management Area (AQMA). A key element of the prevailing poor air quality conditions at this location relate to emissions from diesel engines including those of buses using the junction, which is exacerbated by buses often having to idle while stationary in queuing traffic. Hence, providing some relief from this congestion through the provision of a new sustainable transport link could help contribute to a reduction in emissions at this location.
- **Location of the bus station.** There has been a long standing aspiration, as set out in the 2007 Local Plan and the 2004 Goods Yard Site Development Brief, to relocate the existing bus station as part of the redevelopment of the Goods Yard site, to improve connectivity with the rail station. An essential characteristic of the development site is the importance of establishing a high quality and efficient transport interchange which sets a strong vision for promoting sustainable travel in the town.

To complement the newly redeveloped station facilities, HCC have been developing a design to improve both the existing station forecourt area and associated bus facilities. An outline scheme has been agreed and has been included in a successful bid for funding through the LEP Growth Deal, with a provisional delivery date of 2016/17. If Solum's development proposals were to come forward in line with these timescales it is likely that HCC could provide some support to the delivery of a new facility as part of the redevelopment by utilising the funding that has already been earmarked for station interchange improvements. If the site does not come forward the existing proposals may be delivered in co-operation with the Train Operating Company and any future redevelopment of the wider site would be required to deliver the aspirations for a relocated and improved facility as part of that development.

4. HCC Views on Additional Transport Related Assessment Work

HCC recommend that Solum and/or their transport consultants commence Pre App discussions with the County Council to ensure that there is early dialogue aimed at resolving the transport issues and concerns associated with the development.

Solum should engage with HCC at the earliest opportunity to agree the scoping of a detailed transport assessment. As a minimum this will need to define the development proposals and access arrangements, provide a detailed analysis of trip generation and distribution and the impacts of this on the existing highway network including the benefits of proposed mitigation measures. The assessment will need to recognise the trips generated by any increased car parking provision and set out the proposals aimed at maximising the accessibility of the site, including the improvement of facilities for sustainable modes of travel and their promotion through travel planning. This is especially important due to the sites central location in the town.

In order to meet the additional resource requirements associated with the Pre App process and to support the proposed timescales and needs to inform responses to the variety of highways and transportation issues linked with the site, HCC recommend the establishment of a Planning Performance Agreement (PPA) through which HCC will levy appropriate charges for officer's time. This will help to maximise the quality of the application both in terms of the material submitted and the content of the proposals.

HCC recommend that Solum work closely with the recently established Neighbourhood Planning group both from the perspective of tapping into the groups ideas and in the interests of managing expectations over what can be realistically delivered, in terms of transport impact and mitigation.

The transport impact of the development together with the proposals for measures aimed at mitigating this impact, including the access road, need to be tested within the context of the cumulative transport impacts associated with the wider development proposals included in East Herts District Councils emerging District Plan. Suitable modelling work needs to be undertaken to support this assessment. Solum might wish to consider seeking access to the Paramics model developed by WSP as part of the assessment of the traffic impacts associated with the recent Bishop's Stortford North planning application and to look to extend this to cover the southern half of Bishop's Stortford. Testing would need to consider whether it would be necessary to convert Dane Street to two way operation for the access road to operate most effectively.

It has been suggested in Meyer Brown's technical report that the cost of a new road would be of the order of £4.5M. The total cost however has not been substantiated and it is recommended a more detailed breakdown of costs is made available.

Finally, HCC consider that the Goods Yard Site provides an excellent opportunity to establish a development supported by an exemplar package of sustainable transport measures. It is also considered that this is the only realistic transport strategy for the site when considering the well-recognised restrictions that exist in Bishop's Stortford that prevent the implementation of improvements aimed at creating more capacity for the private car, due to the characteristics of the main roads and junctions within the town.

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 8 DECEMBER 2014
EXECUTIVE – 6 JANUARY 2015

REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING AND
TRANSPORT

DRAFT DISTRICT PLAN - RETAIL AND TOWN CENTRES POLICY
CRITICAL FRIEND APPRAISAL (NOVEMBER 2014)

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report summarises the findings of the Critical Friend Appraisal of the Draft District Plan policies on retail and town centres contained within Chapter 15 and seeks agreement to use the Appraisal to inform the preparation of the East Herts District Plan.

<u>RECOMMENDATION FOR DISTRICT PLANNING EXECUTIVE PANEL AND EXECUTIVE: That:</u>	
(A)	the Retail and Town Centres Policy Critical Friend Appraisal (November 2014), be supported as part of the evidence base to inform and support the East Herts District Plan.
<u>RECOMMENDATION FOR COUNCIL: That:</u>	
(A)	the Retail and Town Centres Policy Critical Friend Appraisal (November 2014), be agreed as part of the evidence base to inform and support the East Herts District Plan.

1.0 Background

- 1.1 Several studies have been undertaken which consider the future needs of the District in retail floorspace terms covering the period of the District Plan. However, what these studies have not covered in depth is how retail centres may need to change in physical terms over the same period in order to accommodate these needs and

reflect changing patterns of retail behaviour. To this end, the Council sought advice from the Planning Advisory Service who agreed to fund a consultant to provide a critical friend appraisal of the Draft District Plan policies on retail and town centres.

- 1.2 Recent policy directions coming from the Government appear to be based upon the desire to achieve short term economic gains by allowing changes of use to non-retail uses. These allowances are attempting to encourage a revival of activity within town centres. However, these allowances, albeit temporary ones, remove the remaining controls used by Local Planning Authorities to retain a high proportion of retail (Class A1) units. What these changes do not do is deal with the longer term issues of contraction and the evolving role of retail centres. If this is what is anticipated then it would be more appropriate to seek to plan effectively for this change than to lose control over changes which may have a detrimental impact on remaining retail and town centre uses.
- 1.3 East Herts Council wants to deliver sustainable communities, which includes ensuring that adequate jobs are provided and the economic needs of the district are met. Part of this involves ensuring that communities have adequate opportunities to fulfil their day-to-day retail needs. Indeed, the National Planning Policy Framework (NPPF) is clear that planning should support economic growth. The NPPF also makes it clear that planning should take a positive approach to retail, promote competitive town centre environments and prepare policies to manage and grow centres.
- 1.4 This report presents the advice of Peter Brett Associates in the form of a critical friend appraisal of the Draft District Plan policies on retail and town centres. It is recommended that the appraisal is used to inform the preparation of the emerging Amendments Draft District Plan, in particular the preparation of Chapter 15 on Retail.

2.0 Report

- 2.1 Consisting of 5 sections, the appraisal introduces the scope of the appraisal in section 1. Section 2 considers the drivers of town centre change. It describes how national economic circumstances have impacted on the success of the retail market. It discusses how the retail market itself is changing, and how this is affecting UK town centres.
- 2.2 Section 3 of the appraisal describes the national approach to retail planning and considers the current position of retail centres in East

Herts. Town centres in the district have not suffered as badly as other centres during the recession but have experienced significant numbers of closures and long term vacancies. The key message arising from this section is that without restrictive retail policies, the trend towards diversification in the high street will continue. However, at the same time, should restrictive policies remain, it is predicted that the number of vacant units could increase. The appraisal recommends that retail policies take account of changing trends as well as changing retailer and consumer requirements, in order to ensure that centres remain vital and viable.

- 2.3 Section 4 of the appraisal critiques the draft retail policies and makes suggestions. The key messages from this section are that the existing draft policies are restrictive and could stifle market demand. Restrictive policies do, however, have a role and the appraisal recommends that the primary frontage boundaries are tightened, wherein a restriction to only A1 and A2 uses would be justified. Coupled with this, the appraisal recommends reducing the size of the secondary frontages to allow peripheral units to change to alternative uses, including housing. This approach should be considered for Bishop's Stortford in particular, where the secondary frontage vacancy rate is at 20%.
- 2.4 The appraisal further recommends that the Council adopts a policy that supports, in principle, all A Use Classes within primary frontages, provided they have an active frontage. Offices and residential units should be encouraged above ground floor level. With regard to secondary frontages, the appraisal recommends that all 'town centre uses' are supported in principle. The appraisal notes that although a unit may change to another town centre use, if the market demand increases, there is nothing to stop it reverting back to A1 uses in time. Indeed, such changes are facilitated by the General Permitted Development Order.
- 2.5 The appraisal provides advice about Hertford town centre given recent interest from landowners and other stakeholders in developing the town centre. The appraisal recommends that the Council seeks to act as a facilitator in preparing a vision for the regeneration of the town centre, which would identify key opportunity sites, environmental improvements, a movement strategy and a plan to achieve the optimum mix of tenants.
- 2.6 The appraisal recommends that the Council updates the forecasts for convenience and comparison floorspace needs in line with the anticipated housing growth across the District. The appraisal acknowledges that the district's town centres will not compete with

larger centres outside of East Herts unless major additional retail floorspace is provided. Instead, the appraisal suggests that it would be more appropriate to accommodate additional floorspace demands within proposed strategic developments in the form of neighbourhood centres. The appraisal also suggests changes to the policies concerning district, neighbourhood and local centres that make them more restrictive.

- 2.7 The appraisal also recommends that an additional piece of work is undertaken that derives the average size of retail units in order to make the policy approach on thresholds more robust.
- 2.8 Section 5 of the appraisal concludes that controlling what uses go where will be difficult for the Council but creating a single vision and a strategy for each town will help to manage changes in the retail market. The focus should not be on expanding the floorspace of town centres but expanding their offer in order to sustain their vitality and viability during the day and night. New floorspace demands should be met within planned urban extensions in a way that does not compete with existing town centres.
- 2.9 To conclude, this appraisal makes various suggestions and recommendations. It is proposed that these recommendations should be used to inform amendments to the retail chapter within the Amendments Draft 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

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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:	None. However, the policies the report is appraising were subject to the Draft District Plan Consultation between February and May 2014. The amended policies will also be subject to consultation through the District Planning Executive Panel and the Amendments Draft District Plan in due course.
Legal:	There are no legal implications as a result of this Survey.
Financial:	There are no direct financial implications of this Report.
Human Resource:	The continuing work on the Draft District Plan is a considerable burden on human resources.
Risk Management:	None
Health and wellbeing – issues and impacts:	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. The retail policies that will emerge as a result of this appraisal will seek to ensure that the District's town centres and retail areas are vital and viable and perform their valuable function as attractive, local service centres in easily accessed locations.

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Retail and Town Centres Policy - Advice to East Herts District Council following the meeting held on 14th October 2014: Draft Report

Ed Salter (Peter Brett Associates)

Claire Sime, Jenny Pierce (East Herts District Council)

1. Introduction

- 1.1 This report has been prepared by PBA (Ed Salter) as a supplier to PAS on behalf of PAS and in response to a request from East Herts District Council planning officers for support in the preparation of their Local Plan retail policies. The required support is specifically in relation to providing a critical examination of the emerging policies to ensure that they are not only robust and reflective of relevant national policy but are also responsive to changing business needs and patterns of retail behaviour.
- 1.2 This report follows the key requirements set out in the brief and a discussion held with officers on 14th October 2014. Advice is provided in accordance with the PAS service offer. The report starts by setting the context for the advice note, namely retail trends at a national level and the National Planning Policy Framework (NPPF). It then discusses retail trends and shopper patterns in East Herts, before providing advice on the development of emerging retail policies and specific actions that may be required to respond to change in each of the centres.

2. Drivers of town centre change

- 2.1 In order to understand how to plan for town centres it is important to first understand key trends in the way people shop, what they look for, how retailers are responding to these changes and how centres are changing at a national level. The following sections set out some of the key trends that are, or will, impact on town centres.

Downturn in the Economy

- 2.2 The sustained downturn in the economy, which started in the last quarter of 2008, and recent period of recession has in part resulted in clear structural changes to the retail landscape in the UK, with a number of high profile retailers entering administration, and discount-end retailers increasing in representation. The downturn has also affected consumer spending, with a greater reluctance to spend amongst consumers on non-essential goods. As a result, the forecast levels of spending growth are subdued.
- 2.3 The economic downturn has also resulted in investors being more cautious. Developers are seeking to play competing centres against each other to secure the

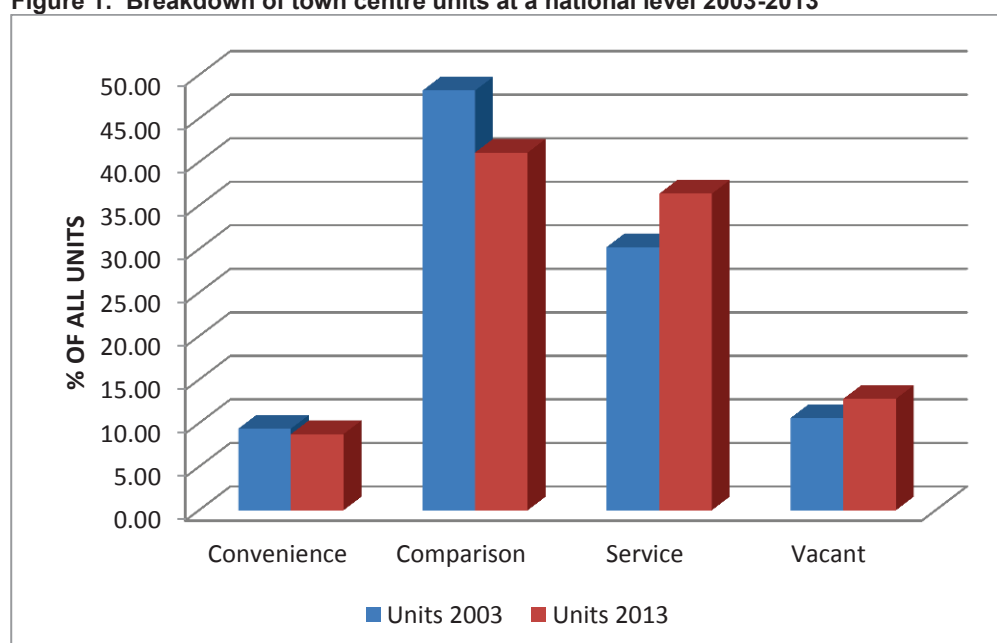
best deal for their outlet or scheme. Nationally, many planned large new retail developments have been suspended until the economy returns to stability.

- 2.4 However, there are some signs that momentum is returning to the retail market, especially for schemes which include some of the stronger performers in the market. There is also considerable development activity by foodstore operators, which has continued throughout the economic downturn.

Polarisation Trend in the UK

- 2.5 The 'polarisation trend' is a significant and long-term trend which has been taking place in UK retail in recent years, and is expected to continue in the short to medium term. It refers to the preference of retailers to concentrate trading activities in larger schemes, within larger centres. Retailers recognise that greater efficiency can be achieved by having a strategic network of large stores offering a full range of their products, rather than a network of smaller-format stores which are only able to offer a limited range of products. Increasingly therefore retailers are seeking to serve larger population catchments from larger stores – and this explains why demand for space at recent major shopping centre openings has been high, whilst demand for premises in small and medium-sized locations has been weak. This trend is highlighted to an extent in Figure 1, which shows how comparison units as a proportion of all town centre units declined between 2003 and 2013, whilst the service sector, driven predominantly by leisure uses, expanded.

Figure 1: Breakdown of town centre units at a national level 2003-2013



Source: GOAD 2003 and 2013

- 2.6 The 'polarisation trend' is also driven by customers, who have become more discerning and are increasingly prepared to travel further afield. There is therefore a concentration of comparison goods expenditure in a smaller number of larger centres. CBRE estimated that by 2008 half the population shopped in just 70 or so major locations, down from 200 locations 30 years ago¹. This concentration of retailing activity poses challenges for the medium and smaller centres, in many cases requiring them to potentially refocus their role and function away from solely being shopping destinations to incorporate a much broader retail, leisure, culture and residential offer.

The continued growth of online retail

- 2.7 UK internet and non-store based retail sales have increased at a rapid pace in recent years.
- 2.8 The increase in e-retail is due to convenience, lower prices than those in stores and shoppers are able to search out bargains including second-hand goods. Growth rates have also been much higher with the gap widening over the past few years as retailers expand product offerings, add in store pick options and experiment with social media. Therefore, whilst sales in traditional High Streets have suffered as a result of the economic downturn, online sales have consistently increased.
- 2.9 While unfavourable economic conditions are forcing retailers to scale back on physical retail space, their online operations allow them to reach a much wider customer base. There has also been recent growth in the 'Click & Collect' method of online shopping - whereby a customer orders and pays for the desired product online, and then collects it from the nearest large branch of the retailer.
- 2.10 Current forecasts from Experian suggest that online shopping on convenience goods is likely to increase over the next 20 years, but in the case of comparison goods, peak at 16 percent between the years of 2022 and 2024, and then marginally decrease. In the period to 2017, Experian consider that non-store retailing will increase at a faster pace than total retail sales. Experian comments that 'Our assumption that after 2018 internet shopping grows in line with total retail sales reflects the maturing of the market as the number of computer-literate adults reaches saturation point'.
- 2.11 The growth in online retail does not equate to a redundant future for 'bricks and mortar' stores. There is a role for physical outlets to act as 'showrooms' for online retailers. However, it does mean that the role and function of high streets - particularly those outside the higher-order shopping centres - are likely to need to consider uses beyond that of traditional retail activity in order to remain vital and viable.

¹ CBRE UK Retail Briefing, September 2008

Changes in the convenience goods sector

- 2.12 Large foodstores (i.e. typically those with a net retail area of at least 25,000 sq.ft / 2,300 sqm) have historically been the primary driver of growth in the convenience goods sector. Growth in floorspace of these large foodstores continued up to and throughout the economic downturn, with a typical 3-4% increase in floorspace per year. Floorspace in smaller stores (smaller-format supermarkets/ convenience stores) has historically declined, whilst floorspace in food specialists (i.e. independent bakers, greengrocers and so on) has also typically reduced. However, this trend has changed as we now explore.
- 2.13 For the most part, the convenience goods sector has been unaffected by the economic downturn - indeed it has often been the beneficiary of floorspace becoming available in town and city centres as a result of comparison goods retailers entering administration. For example, Iceland acquired 57 former Woolworths stores in early 2009, and recently Morrisons acquired a number of stores formerly operated by Blockbuster as part of their 'M Local' network of smaller-format stores.
- 2.14 These acquisitions are reflective of a recent move by convenience goods operators away from opening larger-format stores towards smaller supermarkets and establishing a network of 'top up' convenience goods shopping facilities, often located in town centres.
- 2.15 Verdict Research comment that: *'The second dip of the double-dip recession in 2012 has knocked consumer confidence and shoppers are sticking more tightly than ever to their budgets. They are shopping little and often and sticking more tightly than ever to their budgets... increasing fuel prices, deterring out-of-town trips, and the move towards online food shopping each feed into this trend towards top-up shopping. Out-of-town space is increasingly difficult for grocers to make profitable'.*
- 2.16 Verdict add that: *'The convenience sector is growing ahead of the overall food & grocery market, and small stores are benefiting. The trend towards local shopping is keeping shoppers closer to home and in smaller stores for their food & grocery spend. Multiples have responded by rolling out further c-stores in the case of Tesco, Sainsbury's and Waitrose, or by introducing new formats in Morrisons' case'.*
- 2.17 Verdict consider that the proportion of convenience goods floorspace which will be accounted for by 'smaller stores' will increase from 37.6% in 2007 to 41.6% by 2017. The majority of floorspace will continue to be accounted for by 'superstores' (53% of floorspace by 2017), with 'food specialists' and off-licences continuing to have their market share reduced.

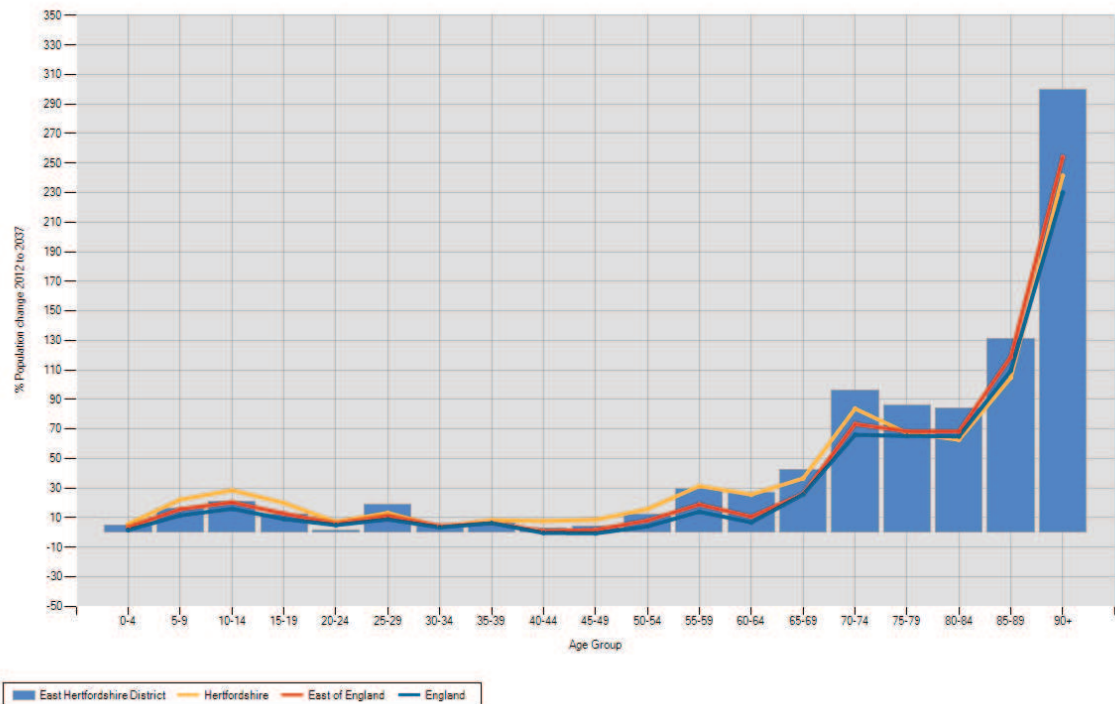
The growth of commercial leisure in town centres

- 2.18 Most commentators predict that commercial leisure, such as cafes, bars, restaurants and cinemas, will constitute a growing share of town centre floorspace. This is partly a replacement activity for reduced demand for space for traditional retail, and partly driven by a shift to increased spending on leisure services as discretionary household expenditure rises.
- 2.19 When considering leisure expenditure available to households, spending on food and drink typically accounts for upwards of 50% of total leisure spending, compared to around 15% on 'cultural services' (e.g. going to the cinema, theatre, art galleries or live music) and under 10% on hotels, 'games of chance' (such as bingo) and recreation/sporting services. There is scope for town centres to capitalise on this, redefining their function as 'destinations' in their own right. This, in turn, can have wider positive implications on the performance of the town centres in question: residents and visitors spend longer in the centre, undertake 'linked trips' between retail, leisure and other uses, and increase their dwell-time in the centre. The development of a strong commercial leisure offer can also help to increase footfall outside of retail hours, for example in early evenings, particularly if the leisure offer also includes facilities such as cinemas.

Changing consumer base

- 2.20 The percentage of the population aged 65 and over is projected to increase by between one fifth and one quarter in all regions by mid 2022. In East Herts the population as a whole is forecast to increase by 23.9% by 2037, driven by a significant rise in the over 65 year olds (see Figure 2).
- 2.21 It is difficult to predict what this will mean for retailing, however, it can be assumed that although the older age groups will want many of the goods and services sought by the younger age groups they will have less disposable income. Furthermore, an ageing consumer base is likely to lead to a growing demand for safer and cleaner local environments for socialising and leisure activities, with a focus on facilities such as cafes and community centres. At the same time, a fall in numbers in the younger age groups may result in less demand for bars etc.

Figure 2 % population change by age group in East Herts by 2037



Source: Herts LIS derived from ONS 2012 based population estimates

What does this mean for UK town centres?

- 2.22 Many town centres face the issue of having too much town centre retail floorspace given recent retailer failures, corporate portfolio rationalisation, high vacancy rates and the impact of the structural shift in consumer shopping patterns caused by the rapid growth in online retail. Furthermore, the growth of multi-channel shopping will continue to divert trade from bricks and mortar retailing for at least another decade.
- 2.23 The impact of these changes will affect centres differently depending on their function and future growth of expenditure in their catchment areas. However, in the future many towns will require a smaller, more focused retail core, repositioned for future consumer and retailer needs - and not focused on the past. Their functions will need to be rebalanced to provide a broader range of alternative functions, including employment, commercial, leisure, community, residential, healthcare and education.

3 Planning for East Herts town centres

3.1 Introduction

Before making recommendations on the emerging East Herts Local Plan retail policies it is important to establish the Government's position on protecting the vitality and viability of town centres. We then examine recent trends in retail and leisure provision in East Herts town centres before discussing and making recommendations on retail policies and strategies.

4 National Planning Policy

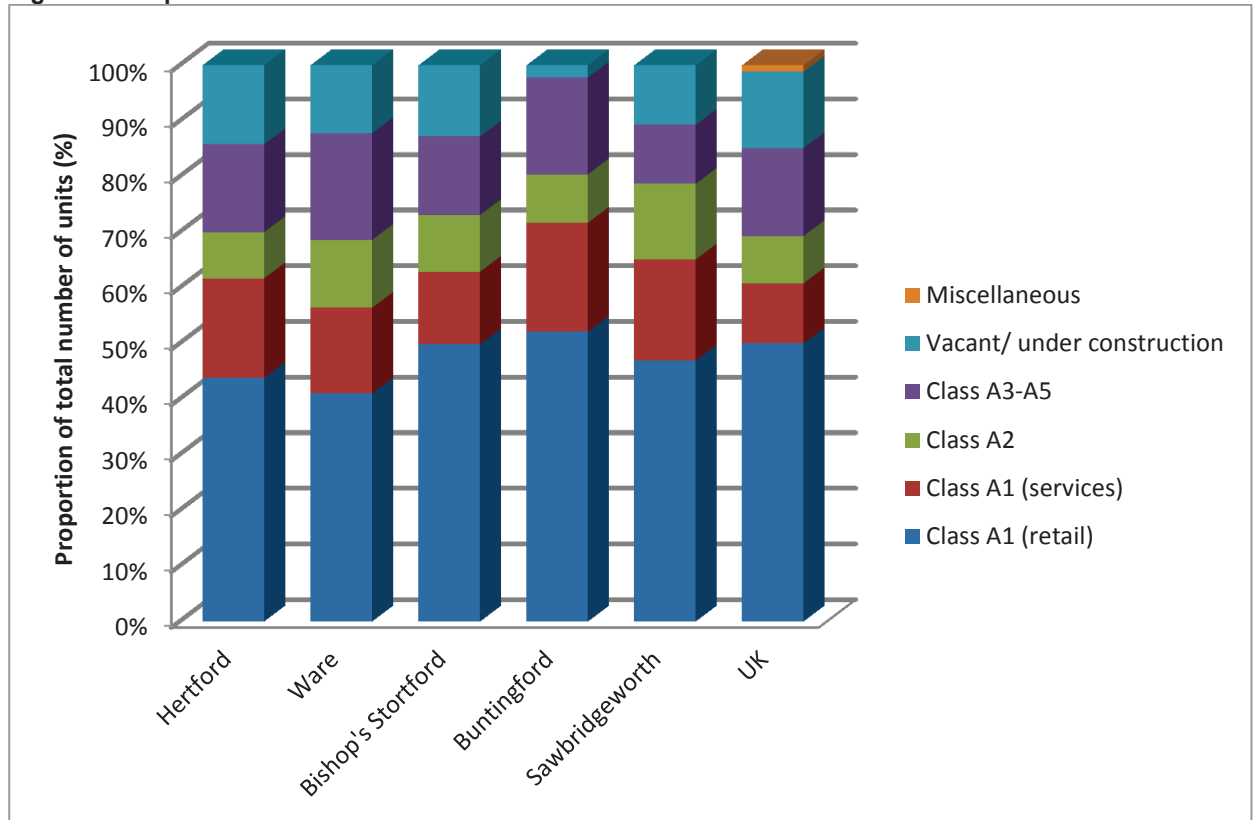
4.1 Local Plan retail policies should be developed in accordance with the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG). The NPPF sets out policies for 'ensuring the viability of town centres', which support the role and function of town centres as the heart of the local community, and promote their continued vitality and viability. Paragraph 23 of the NPPF states that *'planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period'*. In drawing up Local Plans, Local Planning Authorities (LPAs) should *'define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations'*.

4.2 The NPPF identifies that Local Plans should be based on a proportionate evidence base. Plans should be based on *'adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of an area'*, taking full account of relevant economic and market signals. Local Plans should indicate land use designations (such as primary shopping areas and frontages) on a Proposals Map, and also *'identify areas where it may be necessary to limit freedom to change the use of buildings, and support such restrictions with a clear explanation'*.

5 East Herts town centres – the current position

5.1 The drivers of town centre change have already started to take effect in East Herts centres. Figure 3 highlights that the range of uses in each of the centres is more diversified than the national average. Analysis of GOAD data suggests that Hertford, Ware and Sawbridgeworth have a lesser proportion of retail units than the national average, while Bishop's Stortford and Buntingford are on a par with it. In contrast, each of the centres has a greater proportion of estate agents and financial and professional services (A1 services and A2) than the national average, and the larger centres in particular have a high proportion of restaurants, pubs and takeaways (A3, A4 and A5).

Figure 3: Proportion of total number of town centre units in different use classes 2012



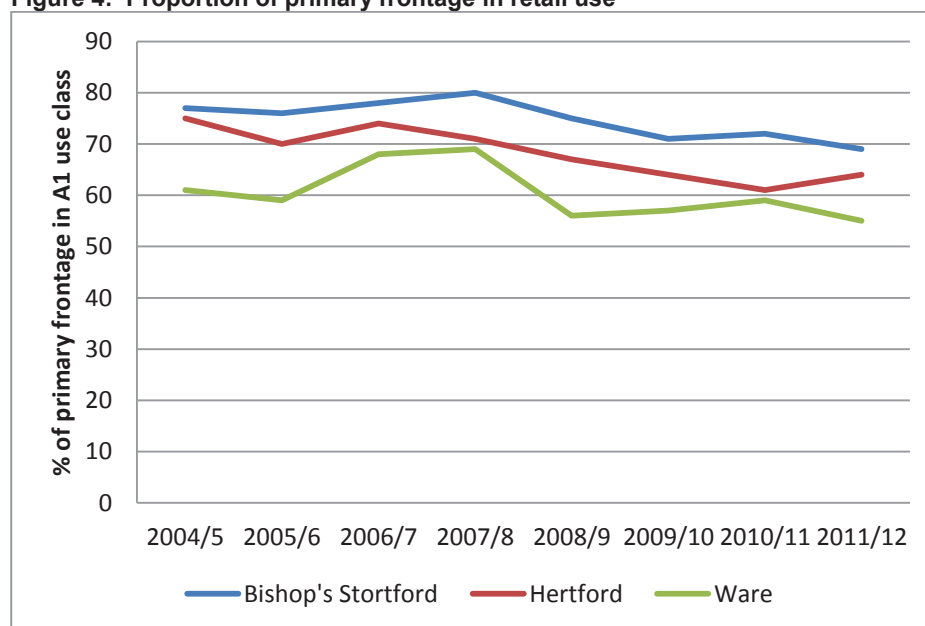
GOAD Plans 2012

- 5.2 Analysis of East Herts DC Annual Monitoring data reveals an overall decline in retail units as a proportion of all primary frontage for Bishop's Stortford, Hertford and Ware (see Figure 4). In the case of Bishop's Stortford and Hertford the change is close to a 10% shift to other uses. The proportion of A1 retail uses now stands at between 55% in Ware and 69% in Bishop's Stortford as a proportion of all primary frontage uses.
- 5.3 The decline in retail units as a proportion of all units in secondary frontage areas has not been as great as recorded in the primary frontages (see Figure 5). The proportion of retail uses stand at 48% and 49% in Hertford and Bishop's Stortford centre secondary frontage areas respectively (see Figure 6). The proportions of retail uses in the secondary frontages of Buntingford and Sawbridgeworth are 44% and 40% respectively, although it should be noted that these centres do not have primary frontages. In contrast, however, only 28% of the secondary frontages in Ware are in retail use, falling from over 40% in 2004/5.
- 5.4 Based on these trends, which were established before the recession and taking account of the drivers for change, it can be predicted that, in the absence of restrictive planning policy to protect retail space, this trend in the diversification of town centre uses across primary and secondary uses would continue. However, should the

restrictive policies remain in place it could be predicted that numbers of vacant units could potentially grow as a proportion of all units.

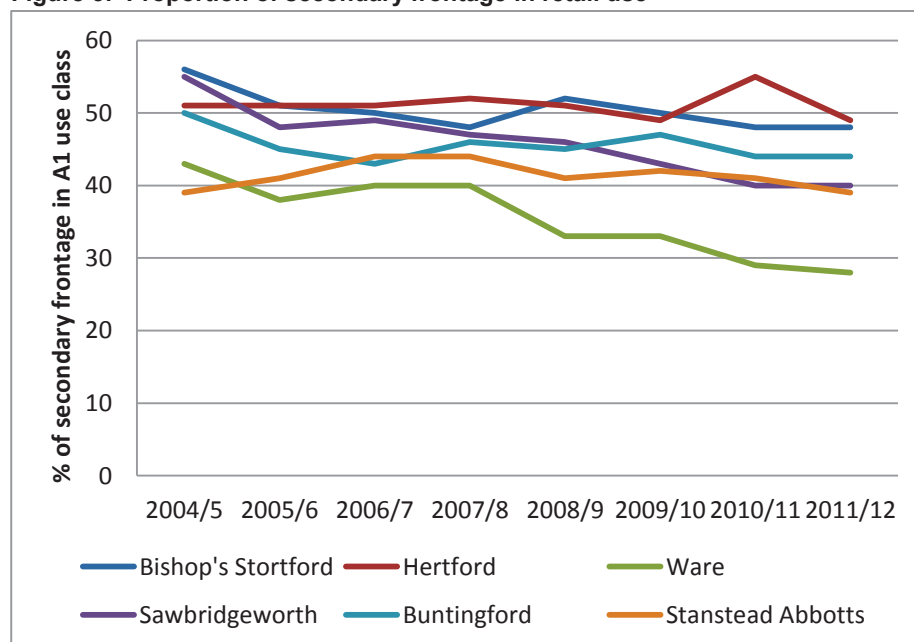
- 5.5 Figure 6 show the proportion of primary and secondary units in each of the town centres that are vacant. These figures are derived from a 2014 survey undertaken by East Herts Council, with the UK average centre vacancy rate derived from GOAD included for comparison purposes. This shows that, apart from the secondary frontage of Bishop's Stortford which experiences a 20% vacancy rate, the East Herts centres are performing relatively well in comparison to the UK average vacancy rate (12.6%). However, this comparison is relatively misleading as the UK average vacancy rate is for centres as a whole and will therefore have likely been skewed by high vacancy rates in less commercially attractive secondary frontage and non-frontage areas. Taking this into account, the vacancy rate in the primary frontage areas of Hertford in particular is of some concern.

Figure 4: Proportion of primary frontage in retail use



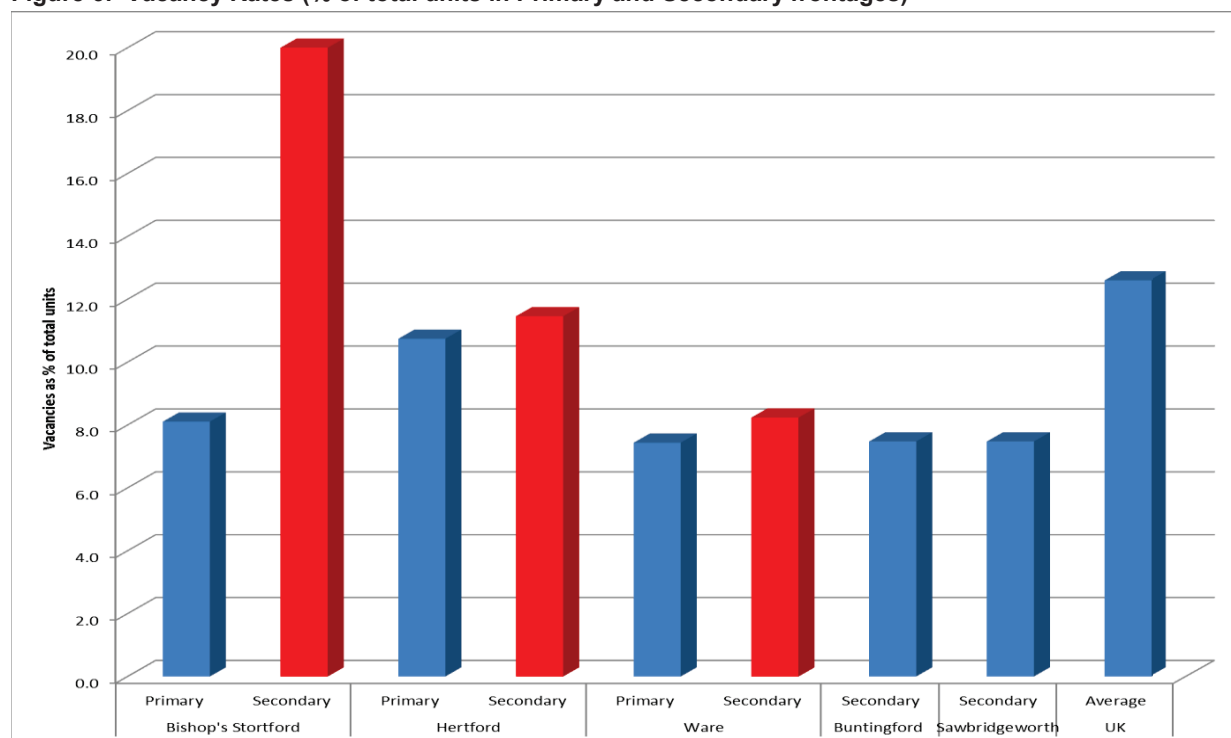
East Herts DC Annual Monitoring Report 2004-2012

Figure 5: Proportion of secondary frontage in retail use



East Herts DC Annual Monitoring Report 2004-2012

Figure 6: Vacancy Rates (% of total units in Primary and Secondary frontages)



East Herts DC 2014

6 Future floorspace requirements

6.1 The East Herts Retail and Town Centres Study Update undertaken by NLP in 2013 provides forecast retail floorspace requirements for the district to 2031. The estimates, which take into account population, expenditure and online purchasing forecasts, as well as existing retail commitments, highlight requirements for 7,120 sqm net of convenience and 5,787 sqm net of comparison floorspace over the Plan period. As a result of suppressed expenditure growth forecasts, coupled with increasing use of online shopping, the bulk of both the convenience and comparison floorspace requirements are not required until after 2026. It is important to note that, due to the length of the Plan period, a cautious approach should be taken with regard to the forecast floorspace requirements beyond 2024.

6.2 The East Herts Retail and Town Centres Study Update also splits the estimated floorspace requirements across each of the town centres in the district. The figures (shown in Table 1) indicate potential for 2,770 sqm net of convenience space in Bishop's Stortford and very limited requirements in the other centres. In contrast, the bulk of comparison floorspace requirement to 2031 is attributed to Hertford (2,939 sqm net), with limited requirements elsewhere.

Table 1: Convenience Goods Floorspace Capacity 2013-2031 (sqm net)

	2013	2016	2021	2026	2031
Hertford	-298	-1,042	-669	-199	325
Ware	149	-426	-160	179	555
Bishop's Stortford	275	-279	557	1,600	2,770
Buntingford	-143	-130	20	210	422
Sawbridgeworth	746	802	927	1,082	1,255
Other	0	-144	385	1,050	1,793
Total	728	-1,218	1,060	3,922	7,120

East Herts Retail and Town Centres Study Update 2013

Table 2: Comparison Goods Floorspace Capacity 2013-2031 (sqm net)

	2013	2016	2021	2026	2031
Hertford	n/a	90	740	1,775	2,939
Ware	n/a	-602	-318	134	642
Bishop's Stortford	n/a	-8,735	-6,363	-2,656	1,519
Buntingford	n/a	5	57	139	231
Sawbridgeworth	n/a	4	47	114	191
Other	n/a	25	81	168	266
Total	n/a	-9,214	-5,757	-326	5,787

East Herts Retail and Town Centres Study Update 2013

- 6.3 In addition to retail floorspace requirements, the East Herts Retail and Town Centres Study Update states in paragraph 4.20 that ‘it is reasonable to assume that there will be scope for a further 20% floorspace that could be occupied by Class A3 to A5 uses’. It goes on to state that, ‘given the relatively low proportion of Class A3/A5 uses in some centres, it may be appropriate to adopt a more flexible approach towards uses that will complement the retail offer of the town centres’.

7 What does this mean for East Herts centres?

- 7.1 The review of town centres in East Herts reveals a similar picture to the national retail trends discussed earlier in this report, particularly with regard to A1 uses being changed to A3 to A5 uses, coupled with increasing vacancy rates. Furthermore, the fundamental changes in the way people shop and the stifled expenditure growth forecasts, have had a significant impact on the retail floorspace requirements over the course of the Plan period. Indeed, between the 2008 Retail and Town Centres Study and the 2014 Update, the net comparison floorspace requirements fell for Bishop’s Stortford from 33,306 sqm net (for 2008 to 2021) to 1,519 sqm net (for 2013 to 2031) and from 13,476 sqm net (2008-2021) to 2,939 sqm net for Hertford.
- 7.2 In summary, the demand for retail floorspace in East Herts has slowed, and will remain suppressed for the foreseeable future. However, the demand for town centre floorspace is changing, with increased take-up by restaurants in particular. It is important that East Herts retail policies take account of these trends, as well as changing retailer and consumer requirements, in order to ensure that its centres remain vital and viable.

8 East Herts policy responses

- 8.1 This section appraises the approach and robustness of emerging retail policies in the Draft District Plan in accordance with the NPPF and taking account of retail trends. It also discusses actions that the Council and partners could potentially pursue in order to gain greater control of the destiny of its centres.

Primary and Secondary Frontage policies

- 8.2 The draft primary and secondary frontage policies included in the East Herts Draft District Plan – Preferred Options Consultation 2014 are set out below in summary:
- RTC3 Primary Shopping Frontages – In order to protect the vitality and viability of the Primary Shopping Areas, within the Primary Shopping Frontages in Bishop’s Stortford, Hertford and Ware.....proposals for the loss of A1 uses will be resisted where this would result in more than 30% of units in a continuous frontage in non-A1 use;

- RTC4 Secondary Shopping Frontages – Within the Secondary Shopping Frontages in Bishop’s Stortford, Buntingford, Hertford, Sawbridgeworth and Ware.....proposals for development or changes of use to those listed in Policy RTC1 will be supported in principle, where this does not lead to more than 50% of units in non-A1 use in a continuous frontage, and does not prejudice the viability of existing A1 uses.

- 8.3 The wording of these policies could be described as restrictive as opposed to being supportive of positive change. To some extent market conditions will dictate which uses go where in East Herts town centres. For example, the primary frontage areas of Bishop’s Stortford, which attracts zone A rents of approximately £850 per sqm², and Hertford (£600 per sqm) will generally be more affordable for A1 and A2 users. In contrast, the Secondary Frontage areas of Bishop’s Stortford and Hertford will be more affordable to independent retailers, restaurants and take-aways. Whilst this is the case, however, a policy that is designed to protect a high percentage of A1 retail uses in the primary and secondary frontages has the potential to stifle market demand and result in high vacancy rates. This in turn has the potential to undermine centre vitality and viability.
- 8.4 As an alternative the Council could consider tightening the primary frontage boundaries of the key towns and restricting them solely to A1 and A2 uses in order to drive up the quality of the retail offer and to gain greater influence on which uses go where. Coupled with this, the reduction in the size of the secondary frontages to allow peripheral units to revert to housing could also be considered where there is considered to be too much commercial stock. This could be potentially be considered in Bishop’s Stortford where the secondary frontage vacancy rate is currently at 20%, as well as in the smaller towns where some stock has already been converted to residential use.
- 8.5 However, it is recommended that East Herts Council retain their boundary definitions and adopt more positive and flexible retail frontage policies in order to reflect changing market conditions and to attract a wide range of people at different times of the day. With regard to primary frontages, it is recommended that the Council adopt a policy that supports in principle all A use classes (i.e. A1 to A5) provided that they have active frontages. Offices and residential uses should also be encouraged above ground floors in order to help add to footfall and vibrancy. Furthermore, with regard to secondary frontage areas, it is recommended that all town centre uses, as listed in draft Policy RTC1³, are supported in principle in defined secondary frontage areas. It is

² NLP (2013) East Herts: Retail and Town Centres Study Update

³ Draft Policy RTC1 of the East Herts Council Draft District Plan – Preferred Options Consultation 2014 supports the following uses in principle: A1 (shops); A2 (financial and professional services); A3 (restaurants and cafes); A4 (drinking establishments); A5 (hot food takeaways); B1a (offices); C1 (hotels); D1 (non-residential institutions); and D2 (assembly and leisure).

important to remember that just because a unit within a primary and secondary frontage designation may change use from retail to another town centre use it does not mean that it cannot revert back to A1 use if market demand returns.

9 Influencing physical change in Hertford

- 9.1 It is clear that the vitality and vibrancy of Hertford town centre is of particular concern to Council officers and elected members. This concern has been heightened by pressure from developers to bring forward out-of-town retail proposals. The extent to which Hertford can adapt to accommodate the future retail trends identified in section 2 of this report, most notably with regard to providing the type of premises required by multiples, is constrained in part by the historic layout of the centre and its buildings. This creates a shopping environment that does not have a clearly delineated high street focus and unit footprints that are not suited to modern multiple retailer requirements.
- 9.2 Bircherley Green Shopping Centre represents the only significant opportunity for large scale redevelopment in Hertford town centre. The scheme being proposed for the Shopping Centre will introduce a larger anchor foodstore, retail and restaurant units as well as 124 apartments. Without taking design issues into account, the mix of space, combined with residential uses will help to drive footfall throughout the day and respond to multiple retailer requirements. This development alone, provided a suitable anchor tenant can be attracted, has the potential to act as a catalyst for attracting investment in the wider centre.
- 9.3 Achieving the right tenant mix and positive change in the rest of the town centre will however be difficult whilst different units are in separate ownerships. Without investor engagement it is likely that it will be much more difficult for the Council to manage the changes in the town centre that are already underway. That said, by establishing town centre management teams and/or Business Improvement Districts (BIDs), other town centres across the UK have been successful in delivering a range of short term projects that can help to drive footfall and attract investment.
- 9.4 Whilst Hertford town centre already has a marketing website and hosts regular street markets it does not have an overall strategy that sets out what changes are required and why. It is important that a vision document and strategy for the town centre is put in place that sets out both short term and more aspirational development projects. It is therefore recommended that the Council facilitate the development of the vision document in partnership with the business community (potentially in the form of a BID) and the residents of the town.
- 9.5 It is recommended that the Council work in partnership with investors, developers and a range of partners to deliver the vision strategy. Furthermore, the Council could

consider investing in major developments that meet vision objectives and that enhance vitality and viability, potentially through prudential borrowing and/or the leverage of private sector investment. Coupled with this, the Council could put in place an acquisition strategy to achieve these goals, although Compulsory Purchase Orders may need to be implemented. In addition, it is recommended that the Council work in partnership with the County Council and independent consultants to develop a new public realm and accessibility strategy and investment plan for the centre to help enhance the shopping experience for all.

- 9.6 Alternatively, in order to gain greater control and the ability to influence longer term change, the Council could take on a role in consolidating the ownership of the centre. Single control would enable an optimum retail policy to be pursued; would enable a reduction and re-configuration of units, where necessary; and it would enable better place-making to be achieved around agreed public policy objectives.
- 9.7 The step by step process which could potentially be applied to Hertford, could involve:
- East Herts Council prepares a planning framework for regeneration of the town centre which is consulted on and adopted. This would be driven by a clear vision for its transformation which could include addressing key opportunity sites, environmental improvements, a non-retail strategy and a plan to achieve the optimum mix and targeting of key tenants.
 - A competition to select an investor partner would be carried out in a very similar way to which development partners are selected for town centre redevelopment;
 - The parties enter into a management agreement, which sets out the aims and scope of the 'managed changes' that the process intended to achieve.
 - The acquisition costs are picked up by the investors and the freehold becomes vested in the Council in the normal way. The process would not involve granting a developer a long lease with obligation to develop an agreed scheme – but a new head lease of the existing interest giving them control.
- 9.8 This approach is easier said than done but similar moves to bring centres under single ownership have helped to deliver significant improvement elsewhere. One such example is Marylebone High Street, which is, like Hertford, constrained by its historic fabric. Over the years the Howard de Walden estate has successfully secured the ownership of more than 70% of the units and has set about delivering its vision of a street lined with coffee shops and ladies fashion stores, and kick started by Waitrose as an anchor tenant.

10 Should the Council seek to allocate additional land?

- 10.1 Tables 1 and 2 in this report, which are derived from the East Herts Retail and Town Centres Study Update 2013, set out the quantified comparison and convenience floorspace requirements based on projected surplus expenditure to 2031. Based on the small quantum of retail floorspace requirements the Council has not decided to allocate additional land for retail use in or adjacent to its town centres.
- 10.2 This approach is considered to be appropriate. However, it should be noted that Experian growth forecasts for comparison and convenience expenditure, as well as levels of online purchasing, are updated on an annual basis. As the economy adjusts post-recession expenditure forecasts are still fluctuating. For example, since the 2013 study was completed Experian have revised their long term expenditure forecasts for convenience goods downwards, whilst comparison expenditure forecasts have grown. It is likely therefore that there is now an increased requirement for comparison floorspace over the East Herts Plan period.
- 10.3 It is not necessary for a complete retail study update to be commissioned. However, we would advise the Council to update the quantified convenience and comparison floorspace figures so that an assessment can be made as to whether the scale of growth warrants allocation/s. Even if the comparison floorspace requirements are adjusted upwards, as expected, it will not necessarily be suitable to allocate it in and around the town centres. Additional floorspace is already being planned in Bishop's Stortford and Hertford, whilst there is unlikely to be demand to deliver significant levels of growth in the other smaller towns. The new floorspace planned in Bishop's Stortford and Hertford will help them to retain their position in the sub-regional shopping hierarchy. However, changing existing shopping patterns, thereby reducing levels of leakage to larger towns outside the district, is unlikely to be possible unless major additional retail floorspace is provided.
- 10.4 Instead, it is recommended that, above and beyond the planned redevelopment proposals in Bishop's Stortford and Hertford, the Council and investment partners should focus on improving existing town centre stock and the public realm. It is considered that much of the quantified convenience and comparison floorspace requirement should be provided in the planned urban extensions in the form of local centres.
- 10.5 The East Herts Retail and Town Centres Update 2013 provides a recommended quantum of A1 to A5 floorspace for the Harlow North urban extension of approximately 9,000 sqm gross, including 4,327 sqm convenience and 2,000 sqm of comparison floorspace, with the remainder being met in non-retail service uses. The authors recommend that this total floorspace should be spread across three local/neighbourhood centres. PBA consider the methodology used to calculate the

floorspace requirement for North Harlow (as set out in Appendix 6 of the Update 2013) to be appropriate. This methodology is based on a four step approach comprising:

- Identifying the amount of expenditure currently available to shopping facilities within the area;
- Projecting available expenditure into the future, taking account of population change, growth in average expenditure per capita and forecast changes in shopping patterns;
- Estimating the proportion of available expenditure that will be retained in the catchment area that will be available to support retail floorspace;
- Converting available surplus expenditure into potential new floorspace.

10.6 It is recommended that the same methodology is adopted to determine an indicative floorspace requirement for local centres in the other proposed urban extensions that are not already committed. It is important however that existing retail provision is taken into account, and that the potential impact of each new local centre on the vitality and viability of existing centres is assessed, before a quantum of floorspace for the urban extensions is set out in planning policy.

11 District, neighbourhood centres and local parades

11.1 Emerging Policy RTC5 sets out that, in summary:

'1. Within District Centres, Neighbourhood Centres and Local Parades, development or change of use to the use classes listed in Policy RTC1 will be supported in principle, where they maintain an appropriate mix to secure the vitality and viability of the district centre or local parade and do not conflict with other policies'

11.2 District and Neighbourhood Centres and Local Parades perform a different role to town centres. They support the day-to-day needs of communities, including providing opportunities for top-up shopping, access to services and social interactions. In order to protect this role it is recommended that the Council adopt a policy that provides protection to the retail uses within them. It is therefore recommended that at ground floor level a minimum of 50% of frontage should be retained for A1 retail use in these centres.

12 Proposals for out-of-town retail schemes

12.1 Policy RTC1 (Retail Development) sets out thresholds above which retail impact assessments are required in support of out-of-town retail applications. These are:

- Over 1,500 sqm gross in Bishop's Stortford
- Over 1,000 sqm gross in Hertford

- Over 500 sqm gross elsewhere.

12.2 These thresholds are derived from paragraph 7.32 of the East Herts Retail and Town Centres Study Update 2013. However, the methodology used for these threshold recommendations is not provided in the text. On first sight these thresholds would appear to be high and will therefore need a robust evidence base sitting behind them.

12.3 In the absence of an evidence base we would advise the adoption of a simple methodology that involves obtaining unit size data for each of the town centres wherever possible, potentially from GOAD, and deriving the average size of units from it. The average size of existing units in each of the towns should be used to justify the threshold that is set.

13 Conclusion and recommendations

13.1 The UK retail environment has fundamentally changed over the last decade as a result of the recession, which has resulted in store closures, the polarisation of multiples to major centres and stifled consumer spending. Coupled with this there has been significant growth in online purchasing. As a result of this there is forecast to be less demand for retail floorspace than previously predicted, particularly in medium and smaller town centres. It is clear that town centres need to develop alternative functions to draw people back and support its retail base.

13.2 The mix of uses in East Herts town centres has been changing in recent years, with retail units gradually being replaced by restaurants and vacancies. In the larger town centres the primary frontage areas, which govern the higher rents, will continue to be taken up by a high proportion of retail businesses. However, in the absence of planning policy restrictions the secondary frontage areas will increasingly be taken up by A3, A4 and A5 uses and may experience high vacancy rates. In response to these trends it is recommended that the Council adopt primary and secondary frontage policies that are less restrictive than those identified in the Draft District Plan – Preferred Options. It is recommended that all A uses are supported in principle in primary frontage areas and that all town centre uses, as identified in draft Policy RTC1, are supported in secondary frontage areas.

13.3 The East Herts Retail and Town Centres Study Update has demonstrated that there will be limited demand for new retail floorspace over the Plan period. Despite this it is promising that major new redevelopment is proposed in both Bishop's Stortford and Hertford town centres. Whilst these proposed developments will not necessarily add significant quantum of additional floorspace to the centres they will help in the attraction of new shops and restaurants and act as a catalyst for private sector investment in the wider centres.

- 13.4 Controlling exactly what types of uses go where will be difficult for East Herts Council to influence. The starting point should be securing private sector buy-in to the development and delivery of a vision document for the centre/s. However, pursuing fundamental long term aspirations will be difficult unless an approach is adopted that helps to bring Hertford and/or other centres under single ownership.
- 13.5 It is recommended that the focus should not be placed on expanding the floorspace of town centres but to expand their offer in order to sustain vitality and vibrancy during the day and at night. The majority of quantified convenience and comparison floorspace requirement should be met in new local centres that will be provided in the planned urban extensions. These local centres should meet day-to-day resident shopping needs and not compete with town centres. Likewise, it is important that a robust assessment for the identification of retail impact thresholds (set out in draft Policy RTC1) is undertaken in order to protect town centres from adverse levels of trade diversion to out-of-town retail schemes.

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 8 DECEMBER 2014 EXECUTIVE – 6 JANUARY 2015

REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING AND TRANSPORT

AUTHORITY MONITORING REPORT 2013/2014

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- The purpose of this report is to seek Members' approval for the publication of the Authority Monitoring Report.

<u>RECOMMENDATION FOR DISTRICT PLANNING EXECUTIVE PANEL AND EXECUTIVE: That:</u>	
(A)	the Authority Monitoring Report 2013/2014 contained as Essential Reference Paper 'B' and Essential Reference Paper 'C' to this report be supported for publication.
<u>RECOMMENDATION FOR COUNCIL: That:</u>	
(A)	the Authority Monitoring Report 2013/2014 contained as Essential Reference Paper 'B' and Essential Reference Paper 'C' to this report be agreed for publication.

1.0 Background

- 1.1 Local Planning Authorities are no longer required to prepare an Annual Monitoring Report (AMR) for submission to the Secretary of State before the end of each year. In addition, the enactment of the Localism Act in 2011 led to the withdrawal of the national core output indicators, giving local authorities the freedom to choose to report on indicators that are considered relevant to their local area and plan-making process.

- 1.2 Section 34, Part 8 of The Town and Country (Local Planning) (England) Regulations 2012 published updated regulations for authorities' monitoring reports. Under these regulations, Local Planning Authorities are now required to report on the following:
- Title of Local Plans or Supplementary Planning Documents (SPDs) specified in the Local Planning Authority's Local Development Scheme (LDS)
 - The timetable specified in the local planning authority's LDS for the documents preparation
 - Progress against the time-table for preparing Local Plan documents and / or any Supplementary Planning Documents (SPDs)
 - The reasons behind if there has been any delay in producing the documents as per the time-table in the LDS
 - Dates and fact sheets of any adopted or approved Local Plans or SPDs
 - Update on current status of saved policies (identifying policies that are no longer in use)
 - Effectiveness of the policies of the emerging Local Plan
 - Housing growth
 - Details of any Neighbourhood Plans and Neighbourhood Development Orders / Areas in the monitoring period
 - Details of actions taken under the Duty to Cooperate within the reporting period
 - Community Infrastructure Levy
- 1.3 This AMR, now called the 'Authority Monitoring Report', reports on the period 1st April 2013 to 31st March 2014. The format of the AMR has changed from previous years to reflect both the updated regulations and a more localised approach to monitoring. The Council is in the process of developing an updated monitoring framework alongside the emerging District Plan and it is likely that the format of the AMR will continue to evolve as part of this process.

2.0 Report

2.1 The key findings from the AMR are as follows:

Local Development Scheme Implementation

2.2 The Local Development Scheme (LDS) sets out the timetable for the production of planning documents. The Council met the milestones set out in the LDS over the monitoring year, namely the agreement by Council of the Draft District Plan Preferred Options document for consultation, and the commencement of public consultation on the document.

Neighbourhood Planning

2.3 There has been a positive response to Neighbourhood Planning across the district. In the monitoring year, pre-submission consultation (Regulation 14) was carried out on the Bishop's Stortford Silverleys and Meads Neighbourhood Plan and the designation of two neighbourhood areas were agreed by the Council at Hertford Heath and Brickendon Liberty. Since the end of the monitoring year, there has been further progress made with regard to Neighbourhood Planning which will be reported in the next AMR.

Duty to Cooperate

2.4 The Council has worked closely with neighbouring local authorities, and prescribed bodies to maximise effectiveness in preparing the District Plan. The Council will continue to monitor the approach taken and produce evidence as part of the plan-making process to demonstrate that the requirement as set out in the Localism Act and NPPF is being met.

Community Infrastructure Levy

2.5 Details of Community Infrastructure Levy receipts and expenditure will be monitored once the CIL has been adopted. Currently it is in the early stages of preparation.

Housing

2.6 Following the withdrawal of the East of England Plan in January 2013, the housing target of 660 dwellings per annum which was contained in that Plan ceased to apply and it became the

responsibility of the Local Planning Authority to devise its own housing target based on their requirements and needs.

- 2.7 The Draft District Plan which was agreed for public consultation by Council in January 2014 identified a housing requirement of at least 15,000 dwellings to be provided over the 20 year plan period, 2011-2031, equating to an annual average of 750 dwellings. As this is an up-to-date evidence based target, this figure is being used to monitor housing delivery and calculate future land supply in this monitoring period.
- 2.8 An additional 366 dwellings (net) were completed in the district during 2013/2014. This number is lower than that recorded in the last monitoring year where 699 dwellings were completed. It is likely that the lower figure recorded this year is due, in part, to that very high figure recorded last year where significant completions were recorded on a number of large sites. It is anticipated that completions in 2014/15 and 2015/16 will be between 550-600 dwellings per year, which will be an increase on this monitoring year.
- 2.9 The Schedule of Housing Commitments included in the AMR as **Essential Reference Paper 'C'** sets out the identified housing commitments anticipated to come forward for development over the five year period 2015/16 to 2019/20. The identified housing supply is 3,769 dwellings. The NPPF requires the Council to have a supply of deliverable sites sufficient to provide five years' worth of housing against housing requirements. The five year land supply calculation has been made using alternative scenarios which produce four different calculations for the five year land supply ranging from 3.4 years to 4.4 years.
- 2.10 The first variation in the calculation concerns the shortfall in housing completions since the start of the Plan period and how it is addressed. The estimated shortfall in housing completions between 2011-2015 is 971 dwellings. There are two approaches that can be used to address this shortfall. These are:
- the 'Liverpool method' – the shortfall since the start of the Plan period is spread evenly over the remainder of the Plan period.
 - the 'Sedgefield method' – the shortfall since the start of the Plan period is addressed in the next five years (wholly within the five year land supply).

- 2.11 The NPPF and NPPG favour the use of the Sedgefield method as it is more closely aligned with the requirements of the NPPF and the need to boost significantly the supply of housing and remedy the unsatisfactory consequences of persistent under delivery of housing.
- 2.12 The second variation in the calculation concerns the addition of a buffer of additional sites bought forward from later in the Plan period. The NPPF requires local authorities to provide an additional buffer of at least 5% to ensure choice and competition in the market for land and seek to provide a genuine margin of adequate supply. It should be stressed that this buffer is not an additional amount on top of the total provision; rather it is moved forward from later in the Plan period. However, in local authority areas where there is deemed to have been a persistent record of under delivery of housing, the NPPF states that the buffer should be increased to 20%.
- 2.13 The five year land supply calculations using the alternative scenarios as outlined above are set out in the tables below:

Table 1: Five year land supply calculation using 'Liverpool method'

Buffer	Annual Housing Requirement	Five year housing requirement	Five year land supply calculation
5% buffer	848.2	4241	4.4 years
20% buffer	960.3	4801.5	3.9 years

Table 2: Five year land supply calculation using 'Sedgefield method'

Buffer	Annual Housing Requirement	Five year housing requirement	Five year land supply calculation
5% buffer	981.7	4908.5	3.8 years
20% buffer	1094.2	5471	3.4 years

- 2.14 The tables above show that, irrespective of which scenario is used, the Council is unable to demonstrate a five year supply of deliverable housing sites. The appropriate method for addressing the shortfall and the level of buffer to be applied, as well as the allocation of additional housing sites to increase the identified

housing supply, will be determined through the District Plan process.

- 2.15 There were 68 new affordable dwellings built during 2013/14, which represents 17.3% of all dwelling completions during the monitoring year. When applying the Local Plan thresholds for eligible sites, 26.9% of completions were for affordable housing, which is markedly lower than the Council's 40% target and also lower than that recorded in the previous monitoring year. The reasons for this are complex and different explanations apply to different sites. A number of sites recording completions this year were large sites which have been in development over the past two to three years; on these sites the affordable housing quota has already been delivered in earlier monitoring years. Another explanation, which is particularly relevant to the brownfield re-development sites, is that permission for development was granted during the recession, and due to viability issues, the affordable housing requirement was reduced to enable development to proceed. It is likely that the delivery of 40% affordable housing on eligible sites will remain a challenging target over the next few years.

Economic Development and Employment

- 2.16 There was 4,979 square metres of floorspace created for employment use throughout the district during the monitoring year, 18% of which was developed on previously developed land.

Shopping and Town Centres

- 2.17 The majority of the primary shopping frontages in the three main settlements are in A1 use. However, vacancy levels in the district continue to fluctuate due to the economic climate.

Environment and Design

- 2.18 There have been no changes to Sites of Special Scientific Interest or Local Nature Reserves in terms of number or area of sites. However, there was an addition to the number of wildlife sites bringing the total number of wildlife sites in the district to 544 from 543 with a subsequent increase in area of 0.94ha.

Renewable Energy

- 2.19 Monitoring renewable energy capacity in the District is not straightforward, although the Council is now obtaining information from permitted planning applications and the completions in the monitoring year that utilise renewable energy generation. A total of 39 permissions were granted with renewable energy facilities and a total of 51kW renewable energy capacity completions were recorded in the monitoring year.

Green Belt and Countryside

- 2.20 There were no major departures from the Local Plan with regards to the Green Belt and the Rural Area Beyond the Green Belt that were referred to the Secretary of State.

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 Town and Country (Local Planning) (England) Regulations 2012
<http://www.legislation.gov.uk/ukxi/2012/767/contents/made>
- National Planning Policy Framework (DCLG) March 2012
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

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ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):	<p>People This priority focuses on enhancing the quality of life, health and wellbeing, particularly for those who are vulnerable, and delivering strong services.</p> <p>Place This priority focuses on sustainability, the built environment and ensuring our towns and villages are safe and clean.</p> <p>Prosperity This priority focuses on safeguarding and enhancing our unique mix of rural and urban communities, promoting sustainable, economic opportunities and delivering cost effective services.</p>
Consultation:	It is a statutory duty under the Town and Country (Local Planning) (England) Regulations 2012 for East Herts Council as the local planning authority to report on net additional dwellings, Community Infrastructure Levy receipts, the number of neighbourhood plans that have been adopted, and action taken under the duty to cooperate.
Legal:	None Known
Financial:	East Herts Council relies on Hertfordshire County Council for data collection and, as such, has been paying an annual fee to the County Council Monitoring Unit for this service.
Human Resource:	None other than the Planning Policy team human resources.
Risk Management:	If the monitoring report is not prepared and made available to the public, the Council will not be fulfilling its statutory requirements.
Health and wellbeing – issues and impacts:	The link between planning and health has been long established. The Authority Monitoring Report includes indicators that report on natural and built environment which are the major determinants of health and wellbeing.

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AUTHORITY MONITORING REPORT 2013-14

December 2014

CONTENTS

Title	Page #
1. Introduction	1
2. Structure of the Report	1
SECTION 1: Contextual Indicators and the Local Context	3-18
3. The Local and Regional Context	4
4. Contextual Indicators	5
4.2 Demographic profile	5
4.6 Economic and Employment activity	8
4.16 Travel flow data	13
4.18 Socio-cultural profile	14
4.21 Housing profile	15
4.23 Environment profile	16
SECTION 2: Indicators from the new Regulations	19-26
5. Indicators from New Regulations	19
5.2 Local Development Scheme	19
5.3 Neighbourhood Planning	21
5.7 Duty to Cooperate	24
5.13 Community Infrastructure Levy	25
SECTION 3: Growth / Changes in the District in the Monitoring Year	27-46
6. Housing growth or changes in the Monitoring Year	27
6.6 Dwelling completions	28
6.8 Five year land supply	29
6.14 Affordable housing completions	31
6.16 Net additional pitches gypsies (Gypsy and Traveller)	32
6.17 Gross housing completions by size and type	32
6.18 Residential density	33
6.19 Dwellings completed on previously developed land	34
6.22 Completions on windfall sites per annum	35
6.24 Distribution of new dwellings	35
6.25 Number of Second Review allocated sites in Phase 1, 2 and 3 with permission pre-March 31 2014	36
7. Economic Development and Employment	
7.2 Amount of floorspace developed for employment by type	37
7.3 Amount of floorspace developed for employment by type in Employment Areas	37
7.4 Amount of floorspace developed for employment by type on PDL	38
7.5 Employment land available by type	38

7.6	Total amount of floorspace for 'town centre uses'	39
8.	Shopping and Town Centres	40
9.	Environment and Design	42
10.	Renewable Energy	43
11.	Green Belt and Countryside	45
	Appendix A: Schedule of Housing Commitments	47
	Appendix B: Housing Completions by settlement	50

1. INTRODUCTION

- 1.1 There is no longer a requirement to produce an Annual Monitoring Report on an annual basis for submission to the Secretary of State: however the duty to monitor and report still remains an important part of the plan-making process for Local Planning Authorities. These reports are now called Authority Monitoring Reports and can be updated as frequently as deemed necessary, instead of being updated just once a year.
- 1.2 This is East Herts' tenth monitoring report now called the Authority Monitoring Report (AMR). This AMR reports on the period from 1st April 2013 to 31st March 2014, referred to as the 'monitoring year' in this report and others. This AMR reports on the following:
- Local Context and Contextual Indicators - indicators that set the scene/paint the picture of the district that we're planning for
 - Progress of the Development Plan against the LDS
 - Neighbourhood Planning
 - Duty to Cooperate
 - Community Infrastructure Levy
 - Growth/changes in the district in the monitoring year

2. STRUCTURE OF THE REPORT

- 2.1 The report is divided into 3 sections to incorporate the new format. **Section 1** includes the "**Local Context and Contextual Indicators**" that paint the social, environmental and economic picture of the district in the wider geographical context essentially with the surrounding area against which the Local Plan Policy operates. **Section 2** includes **the indicators from the new regulations** including progress against the current Local Development Scheme, progress in the production of Neighbourhood Plans, the 'Duty to Cooperate' actions and details, etc. **Section 3** includes the growth in **housing numbers** and the calculation of the **five year land supply** in the district and the rest of the indicators (retail, employment and environmental changes).
- 2.2 Where, there has not been any change in the District with respect to the monitoring indicators, they have been drawn upon from the previous year's Annual Monitoring Report. For example, some of the contextual indicators and the local context have not changed significantly since the last report in February 2014, and so have been

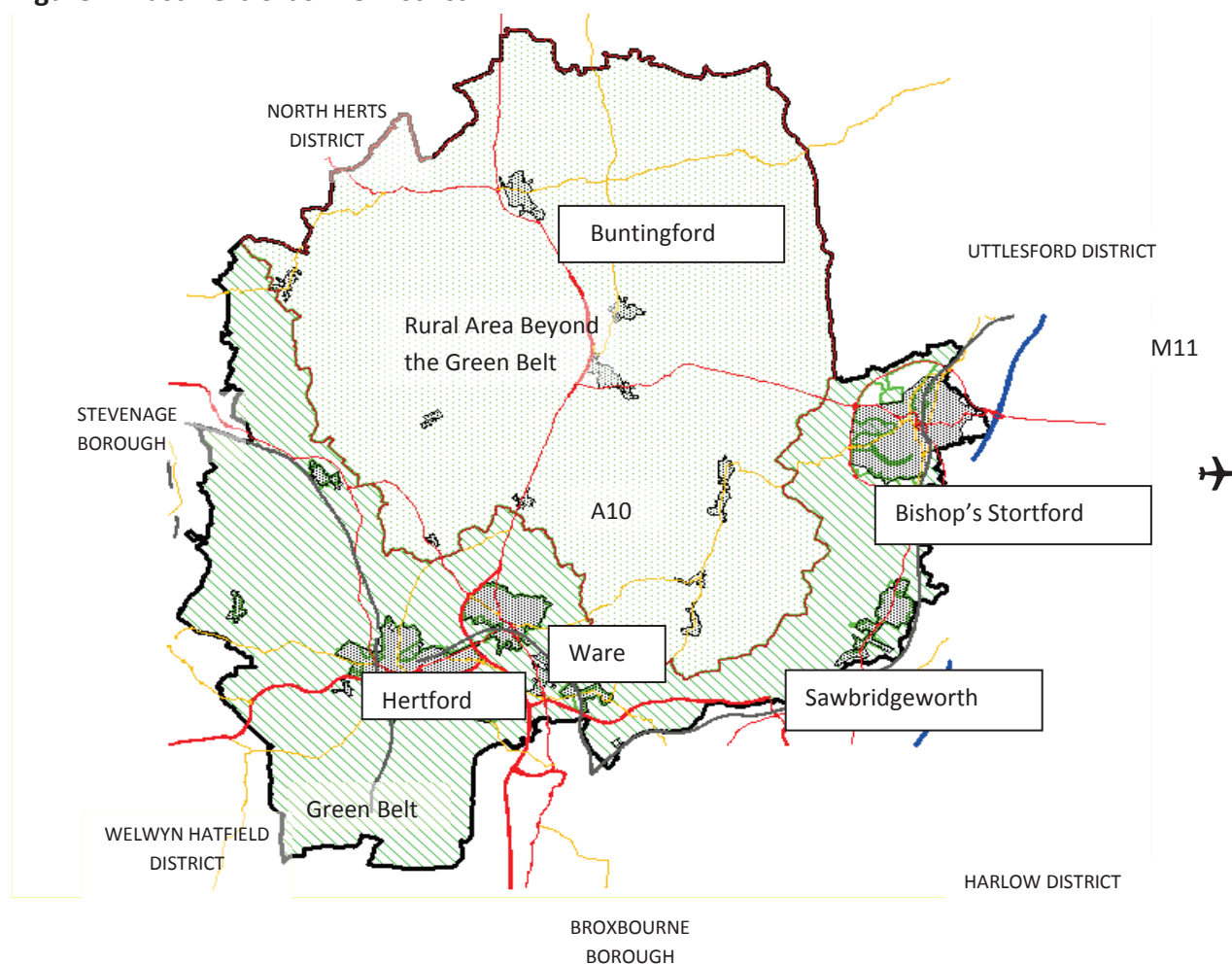
included from the previous report. However, where changes have been observed, new and updated information has been included in this AMR.

SECTION 1: CONTEXTUAL INDICATORS AND THE LOCAL CONTEXT

3. THE LOCAL AND REGIONAL CONTEXT

- 3.1 East Herts is predominantly a rural district comprising an area of 477 square kilometres (184 square miles) and covering approximately a third of the area of Hertfordshire. There are over 100 small villages and hamlets in the district in addition to the five historic market towns of Bishop's Stortford, Buntingford, Hertford, Sawbridgeworth and Ware. These market towns provide a range of services to the nearby rural area. Approximately the southern third of the District lies within the London Metropolitan Green Belt, while the rest of the northern and central area lies within the Rural Area Beyond the Green Belt designation under the current Local Plan Second Review Saved Policies.
- 3.2 The larger town centres are in Bishop's Stortford, Hertford and Ware, though the smaller settlements support a healthy number of shops and related services. The District is bordered by larger towns, with Stevenage and Welwyn Garden City to the west and Harlow to the south-east. **Figure 1** illustrates the main features of the District in the wider geographical context.

Figure 1: East Hertfordshire District



- 3.3 The district has good road and rail transport links and is well connected to the wider area. The A1M and M11 run close to the western and eastern boundaries of the district respectively. In addition, the M1 and M25 are located in close proximity to the district. Within the district, the A414 runs from west to east whilst the A10 cuts the district from north to south. The district benefits from two mainline rail links into London. Stansted Airport lies adjacent to the north-eastern boundary of the district within Uttlesford district. However, the location of Stansted Airport adjacent to the district has strategic implications for the district in terms of economic development, housing and aircraft generated noise pollution. The district's excellent transport links make it an attractive place to live and as such continue to create pressure for new development, particularly housing, which is clearly evident from the contextual indicators shown in the report.

4. CONTEXTUAL INDICATORS

- 4.1 The following indicators help paint a portrait of the district with respect to its socio-economic profile and have been included in the report.
- Demographic profile
 - Economic activity
 - Travel flow data
 - Housing profile
 - Socio-cultural profile
 - Environment profile

Demographic profile

- 4.2 From the following table, it can be observed that the District has seen a significant increase in its population over the last ten years. The population figures are the mid-year estimates from 2004 onwards. There has been an increase of **8.12%** in the population **since 2004** up to the mid-year estimate figures of **2013** in the District in comparison to 8.91% of increase in Hertfordshire and 7.31% in England.

Table 1: Population estimates over the last decade (all numbers in thousands)

Area	Mid 2004	Mid 2005	Mid 2006	Mid 2007	Mid 2008	Mid 2009	Mid 2010	Mid 2011	Mid 2012	Mid 2013	Change 12-13
East Herts	130.5	131.5	132.1	133.4	134.8	136.0	136.9	138.2	139.5	141.1	1.6
H'ford-shire	1047.4	1055.5	1063.2	1073.0	1085.4	1096.6	1107.6	1119.8	1129.1	1,140.7	11.6
England	50,194.6	50,606.0	50,965.2	51,381.1	51,815.9	52,196.4	52,642.5	53,107.2	53,493.7	53,865.8	372.1

Source: Office for National Statistics, 2014

- 4.3 The table below shows the components of population change in the monitoring year 2013-14. The table shows that there has been natural and migration growth (463 and 1,158 respectively) in the District within the monitoring year.

Table 2: Components of Population Change, mid-2013

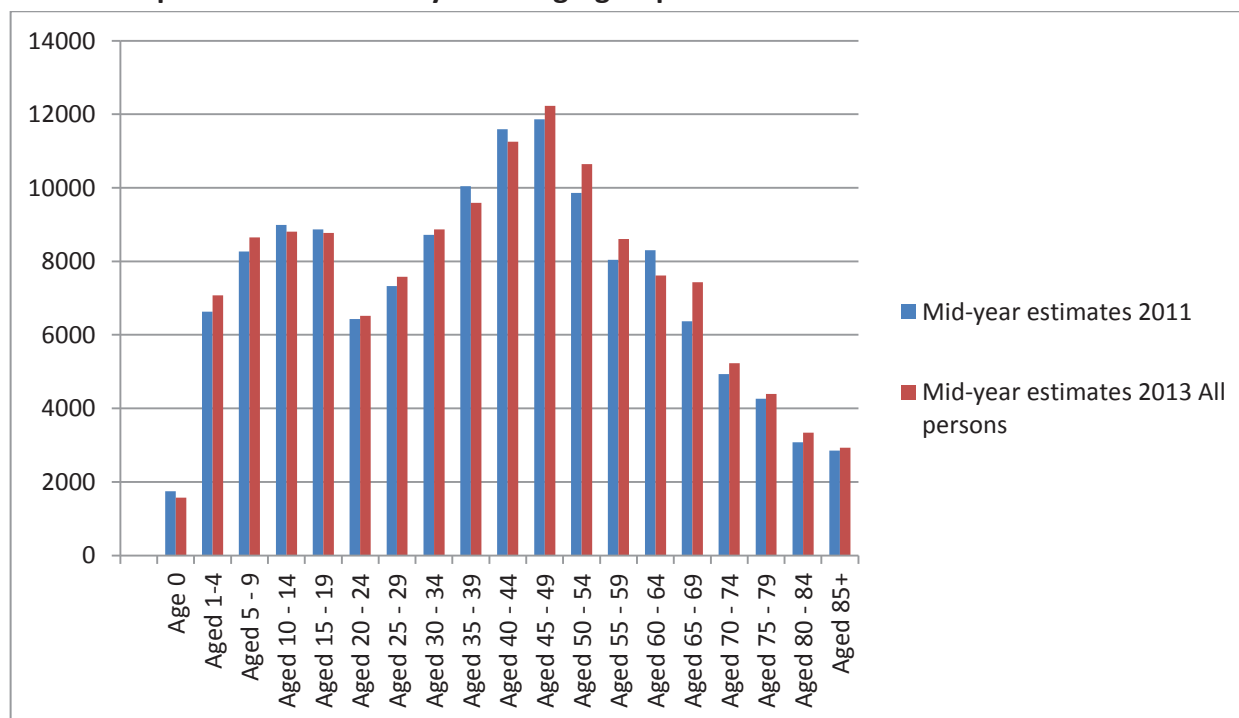
Area	Population mid-2012	Births minus deaths	Net Internal migration	Net International migration	Other	Population mid-2013
England	53,493,729	199,781	-5,741	174,836	3,212	53,865,817
Hertfordshire	1,129,096	5,095	4,748	1,685	82	1,140,706
East Herts	139,458	463	823	335	-3	141,076

Source: Office for National Statistics, 2014

Population by broad age-group and Population Projections

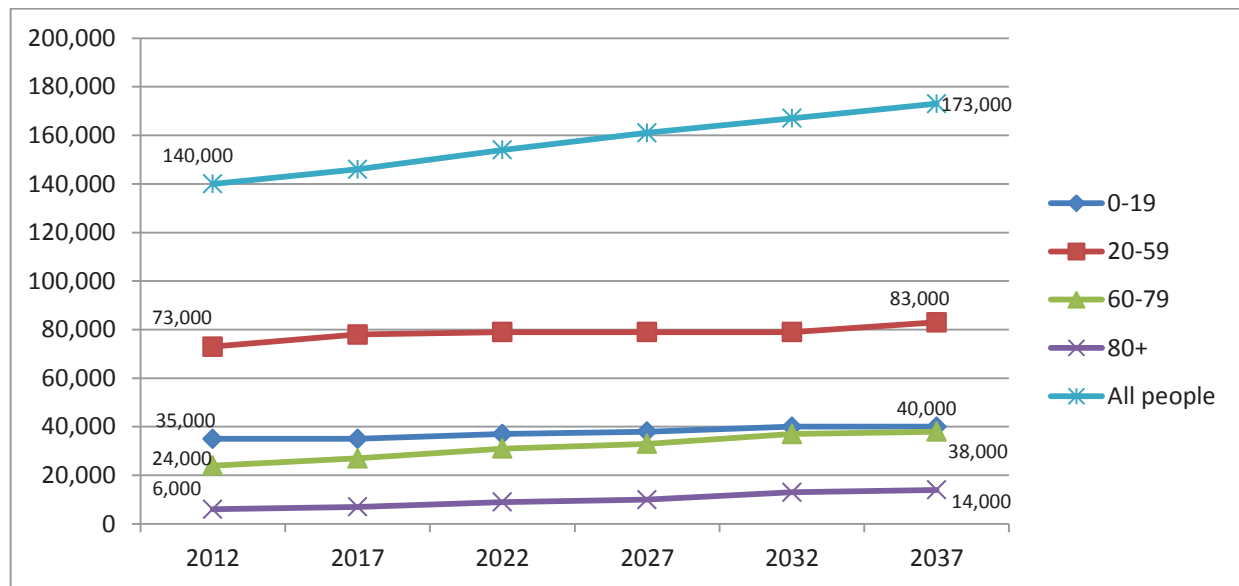
- 4.4 The following charts show the mid-year population growth in 2013 by broad age groups. From the charts, it can be seen that there has been a consistent rise in the population in each age group except in age 0, age groups 10-19, 35-44 and age group 60-64. However, Chart 2 shows that there will be a significant increase in the number of people aged 60 years and above while there would be a steady rise in the age groups of 0-19 and 20-59. These figures are based on the data from the Subnational Population Projections 2012 and are indicative of an ageing population in the UK.

Chart 1: Population estimates by broad age-group



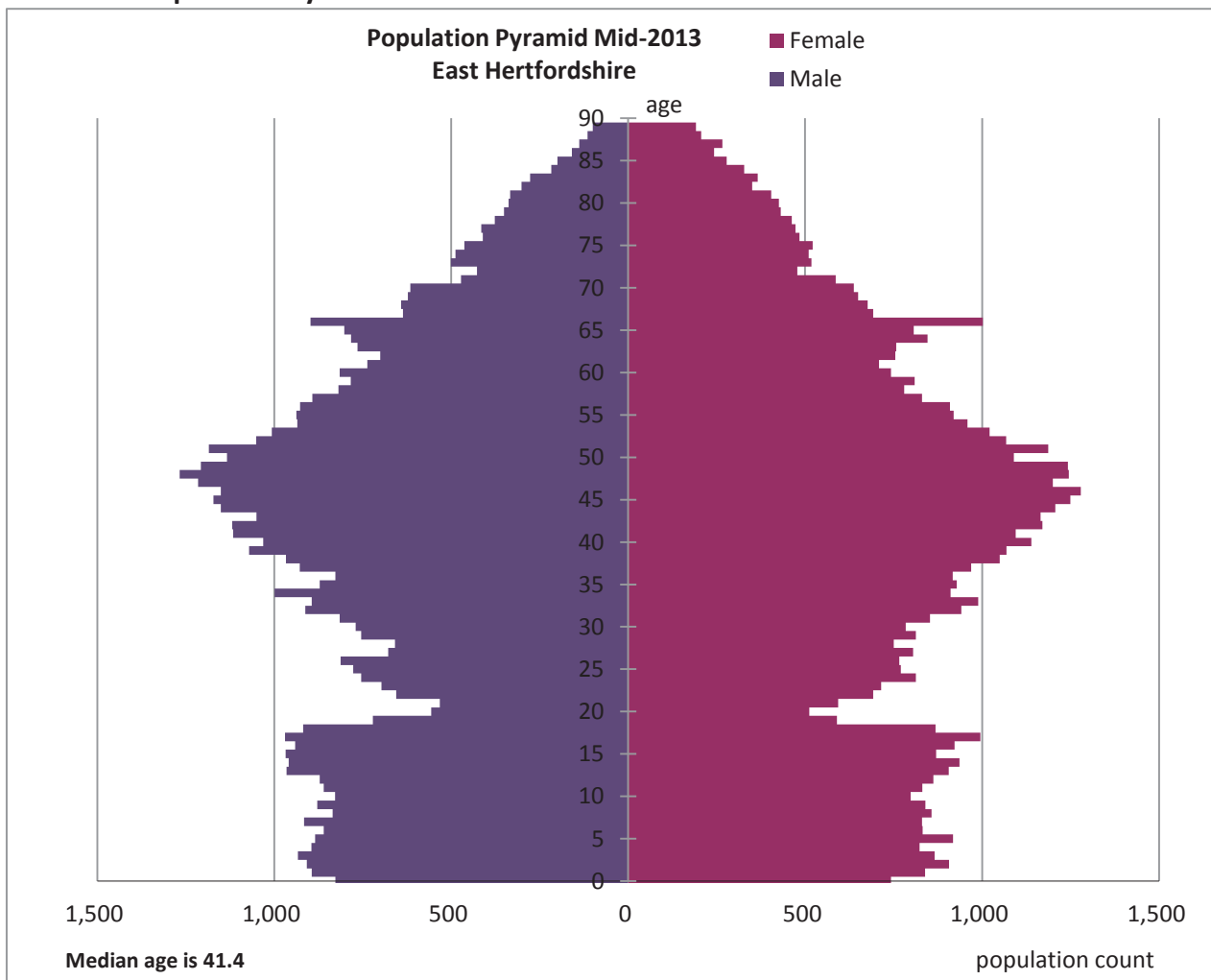
Source: Annual Mid-Year Population Estimates for the UK, Office for National Statistics © Crown Copyright 2014

Chart 2: Projected age profiles for East Herts



Source: 2012 Subnational Population Projections, Office for National Statistics 2014

Table 3: Population Pyramid Mid-2013



Source: Annual Mid-Year Population Estimates for the UK, Office for National Statistics, 2014 – data for ages 0-89 inclusive. Data for ages 90 and above is not included in this chart

Population in East Herts by broad ethnic group

4.5 The following table shows the broad ethnic breakdown in East Herts. The mid-year estimates are not available for this group as the population data by ethnicity is only collected and presented in each Census. From the 2011 Census, in East Herts 131,500 people (95.5%) were White and 6,200 Non-White (4.5%). In the East of England, 90.8% of the population were White. In East Herts, the greatest proportion of non-white people was Asian/Asian British (2.0% of the total population); this compares with 4.8% of the total population for the East of England for this broad ethnic group. In Hertfordshire, the proportion of white people within the total population was 87.6% and the proportion of Asian/Asian British was 6.5%.

Table 4: Population by broad ethnic group 2011 (all numbers are in thousands)

	All groups	White	Mixed/ Multiple ethnic groups	Asian/ Asian British	Black/African/ Caribbean/ Black British	Other ethnic groups
East Herts	137.7	131.5 (95.5%)	2.2 (1.6%)	2.7 (2.0%)	1.0 (0.7%)	0.4 (0.3%)
Hertfordshire	1,116.1	977.5 (87.6%)	27.5 (2.5%)	72.6 (6.5%)	31.4 (2.8%)	7.1 (0.6%)
East	5,870.0	5310.2 (90.8%)	112.1 (1.9%)	278.4 (4.8%)	117.4 (2.0%)	28.8 (0.5%)
England	53,012.5	45,281.1 (85.4%)	1,192.9 (2.3%)	4143.4 (7.8%)	1846.6 (3.5%)	548.4 (1.0%)

Source: Census 2011, Office for National Statistics

Economic and Employment Activity (including labour supply)

4.6 This section pulls together the information about economic activity in the District. Apart from employment and unemployment numbers, the section includes information on employment by occupation, qualifications, earnings by residence, out-of-work benefits, jobs and business counts in the District.

4.7 As can be seen from Tables 5 and 6 below, the resident population in East Herts in 2013 was 141,100 and the total population aged 16-64 was 89,800 (63.6% of the total population).

Table 5: Resident Population

Total Population 2013			
	East Herts	East of England	Great Britain
All people	141,100	5,954,200	62,275,900
Male	69,300	2,929,500	30,635,700
Females	71,800	3,024,700	31,640,200

Source: Mid-year Population estimates 2014

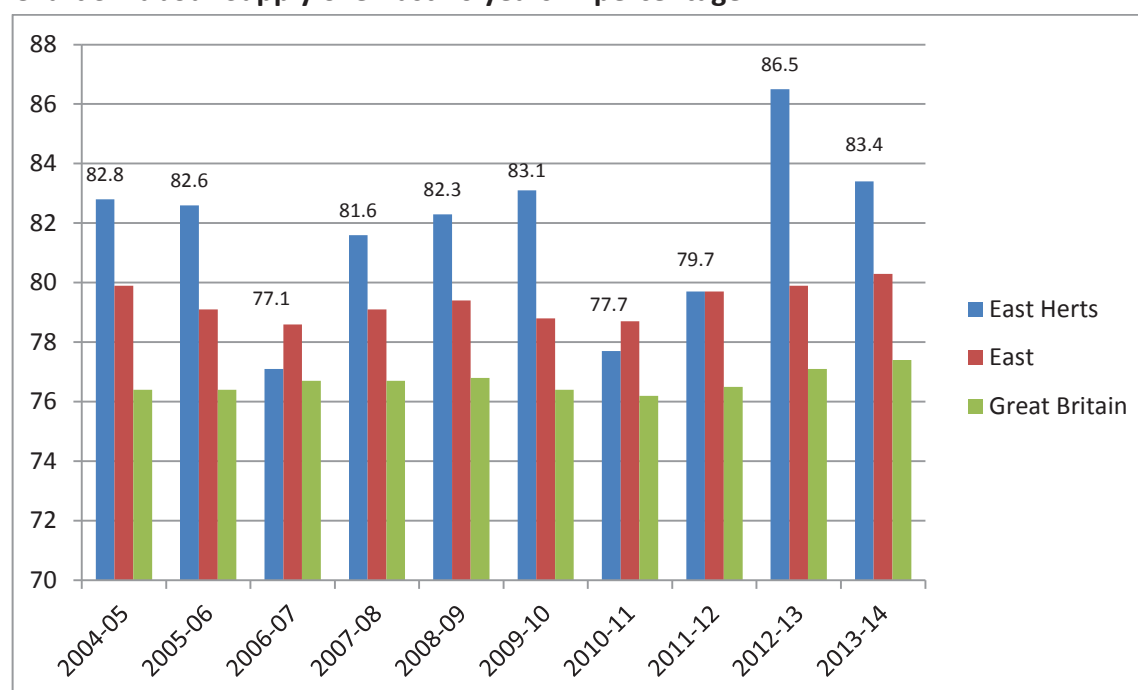
Table 6: Population aged 16-64

Population aged 16-64 (2013)	(% is a proportion of total population)			
	East Herts (Count)	East Herts	East of England	Great Britain
All people	89,800	63.6%	62.4%	63.8%
Male	44,400	64.1%	63.0%	64.6%
Females	45,400	63.2%	61.7%	63.1%

Source: Mid-year Population estimates 2014

Labour supply

4.8 The labour supply in the district over the past ten years is shown in Chart 3 below. The labour supply is the amount of economically active people in the district, calculated as a percentage of the total number of people aged 16-64.

Chart 3: Labour Supply over last 10 years in percentage

Source: ONS Annual Population Survey 2014 – Time Series Data (accessible from

<http://www.nomisweb.co.uk/reports/lmp/lq/1946157224/report.aspx?#ls>)

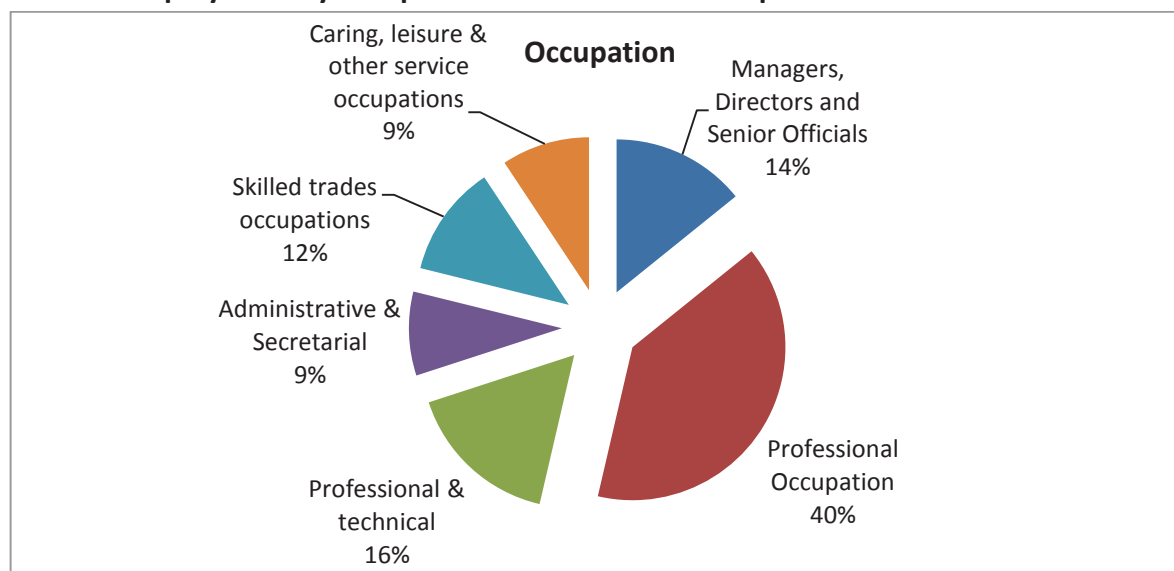
(All people, economically active is a sum of all males and females population in employment (employees and self-employed) and the unemployed who are waiting to start the job following an interview, have had an interview in last two weeks or have been looking for work in last four weeks prior to the interview held for Annual Population Survey)

4.9 The percentage of economically active people in East Herts has been fluctuating in the last 10 years with a slight decrease in the current monitoring year compared to 2012/13, whilst the same has increased slightly in the region and nationally. However, it must be noted that in any case, the labour supply in the district has remained above that recorded in the region and the country.

Employment by occupation

4.10 Between April 2013 and March 2014, the highest proportion of all persons in employment in East Herts was that in professional occupations (40%) followed by those in professional and technical occupations (16%) and managers, directors and senior officials (14%).

Chart 4: Employment by occupation in East Herts from April 2013-March 2014

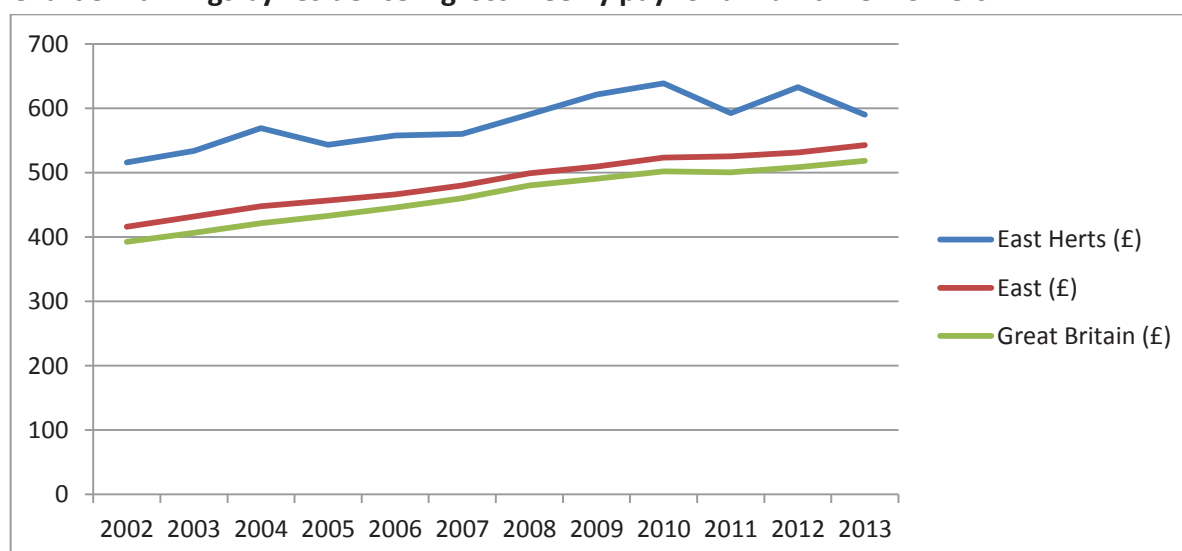


Source: ONS Annual Population Survey 2014 – Time Series Data (accessible from <http://www.nomisweb.co.uk/reports/lmp/la/1946157224/report.aspx?#ls>) % is a proportion of all persons in employment

Earnings by residence

4.11 As can be seen from the chart below, the weekly earnings in East Herts have been higher than those in the region and country over the last few years.

Chart 5: Earnings by residence – gross weekly pay for all full-time workers

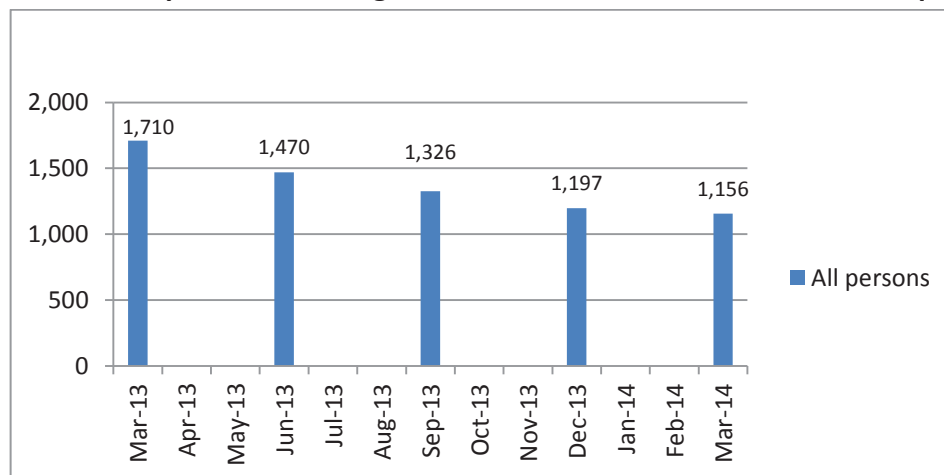


Source: ONS annual survey of hours and earnings - resident analysis 2013, accessible from <http://www.nomisweb.co.uk/reports/lmp/la/1946157224/report.aspx?#ls> Earnings in pounds for employees living in area

People claiming Job Seeker's Allowance

4.12 The following chart shows the proportion of the resident population of the district aged 16-64 claiming Job Seeker's Allowance (JSA) in the monitoring year. As can be seen from the chart, the number of persons claiming the JSA has decreased steadily from the start to the end of the monitoring period.

Chart 6: All persons claiming Job Seeker's Allowance in East Herts – quarterly



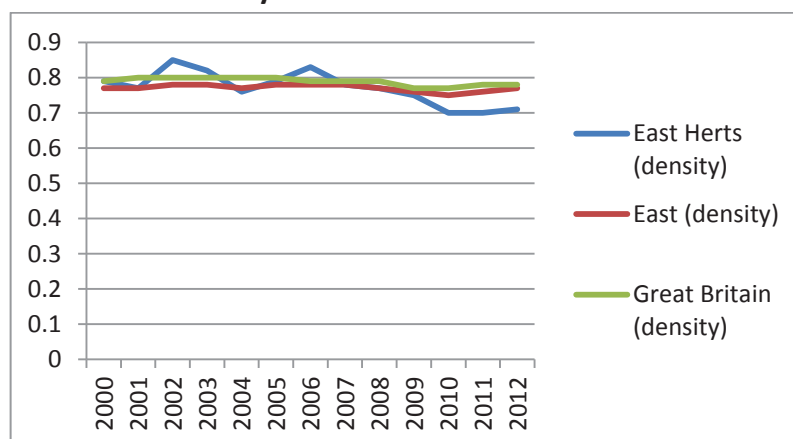
Source: ONS Claimant Count with rates and proportions 2014, accessible from <http://www.nomisweb.co.uk/reports/lmp/la/1946157224/report.aspx?#ls>

Note: % is a proportion of resident population of area aged 16-64

Job density

4.13 The density figures represent the ratio of total jobs to population aged 16-64. Total jobs includes employees, self-employed, government supported trainees and HM Forces. This data is not updated seasonally, and hence has only been included till 2012. As can be seen in the chart below, the job density in East Herts has fluctuated since 2000, although a steady job density (0.70) has been recorded since 2010. The job density remains lower than the regional and national figures in 2012.

Chart 7: Job density between 2000 and 2012



Source: ONS Jobs Density (Time series data accessible from <http://www.nomisweb.co.uk/reports/lmp/la/1946157224/report.aspx?#ls>)

Business Counts in East Herts

4.14 There has been a steady rise in the number of businesses in the district over the last 4 years, both in enterprises and local units. The Business Register data shows that there is a higher number of micro to small enterprises (over 90% of the total number of enterprises) and local units (over 87% of the total number of local units) than medium to large ones.

Table 7: Business counts in East Herts

	Enterprises	Local units
2011	6,605	7,500
2012	6,750	7,635
2013	6,765	7,670
2014	7,120	8,005

Source: Inter Departmental Business Register (ONS)

Table 8: Business counts as per the size in East Herts

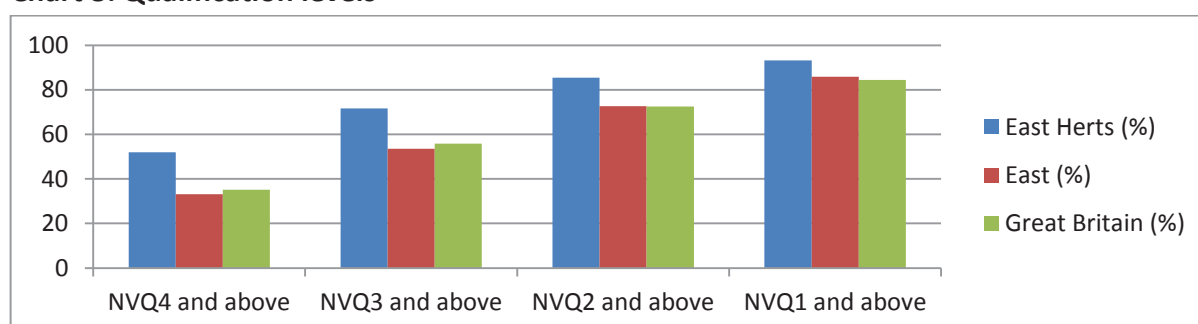
	2011	2012	2013	2014
Enterprises				
Large (250+)	15	20	20	20
Medium (50 to 249)	85	90	90	110
Small (10 to 49)	490	515	530	550
Micro (0 to 9)	6,015	6,125	6,125	6,445
Local units				
Large (250+)	20	25	25	25
Medium (50 to 249)	150	155	145	155
Small (10 to 49)	790	810	830	855
Micro (0 to 9)	6,540	6,670	6,670	6,975

Source: Inter Departmental Business Register (ONS)

Qualification levels in East Herts

4.15 The rate of qualification levels in East Herts is higher than that in the region and the country for all the levels as shown in the chart below.

Chart 8: Qualification levels

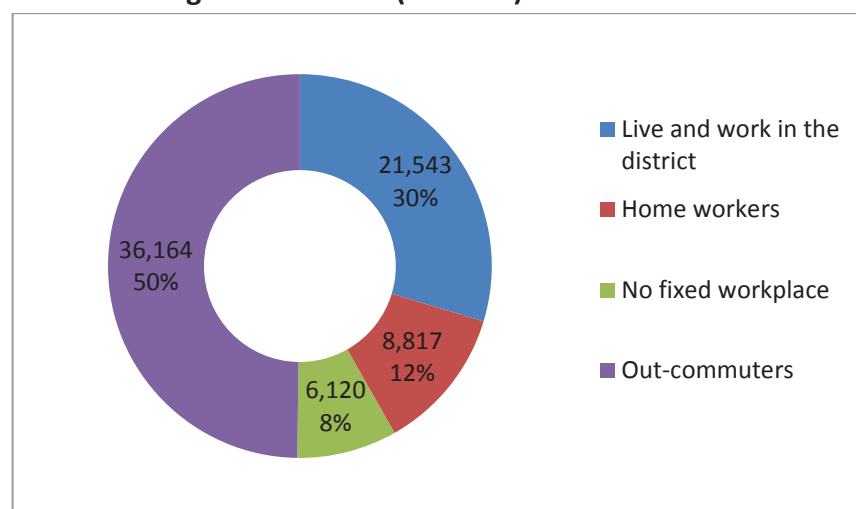


Source: ONS Annual Population Survey

Travel Flow data

4.16 Based on the 2011 Census data, East Herts has a higher number of out-commuters than in-commuters – i.e. more people leave to work outside the district than come into the district to work. In East Herts, over 50% of the residents commute out to a different area / local authority to work, whilst over 38% of the workplace population in the district commute in from different local authorities.

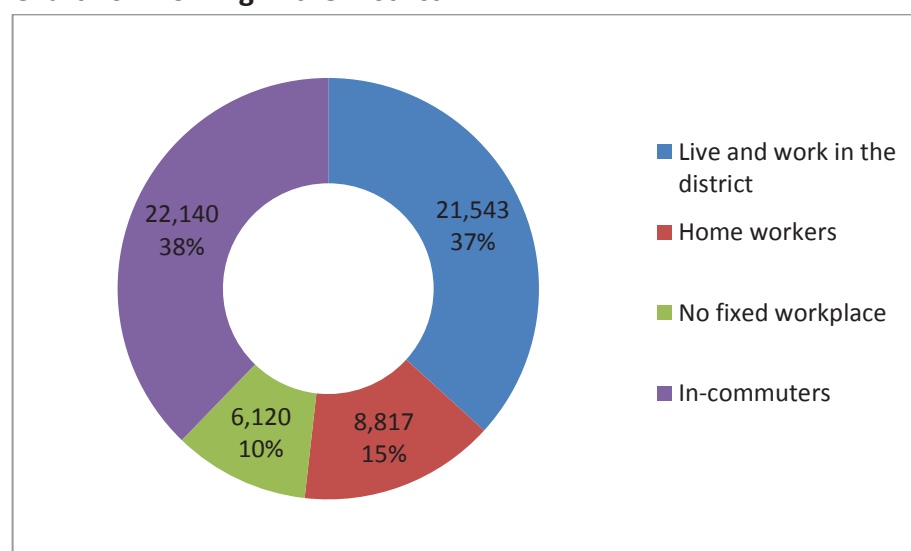
Chart 9: Living in the District (workers) 2011 Census



Source: *Commuting Patterns in the UK 2011 – Part of 2011 Census, Origin-destination Statistics on Migration, Workplace and Students for Local Authorities in the United Kingdom Release*, 25th July 2014

(<http://www.ons.gov.uk/ons/rel/census/2011-census/origin-destination-statistics-on-migration--workplace-and-students-for-local-authorities-in-the-united-kingdom/sum---commuting-patterns-in-the-uk--2011.html>)

Chart 10: Working in the District

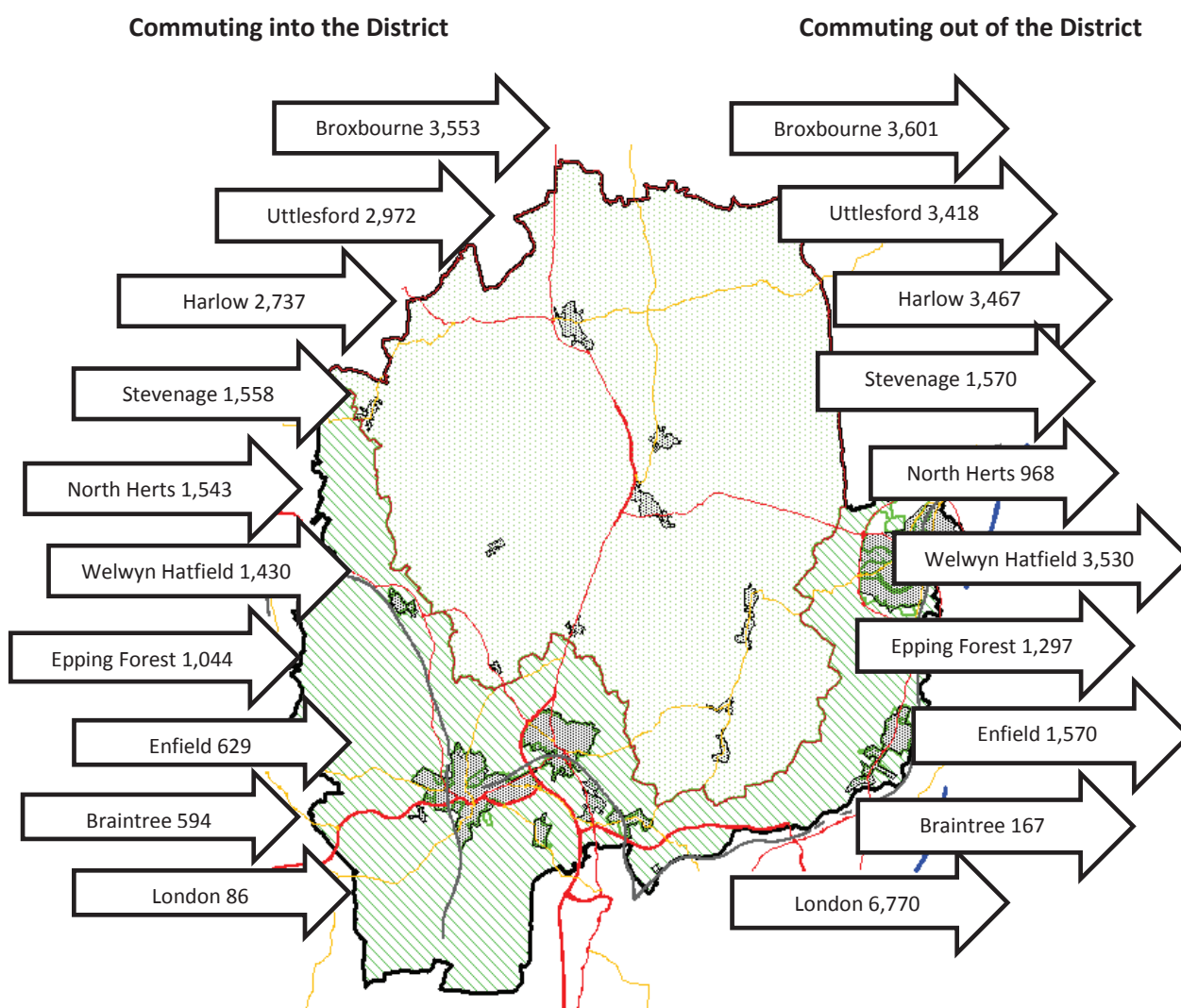


Source: *Commuting Patterns in the UK 2011 – Part of 2011 Census, Origin-destination Statistics on Migration, Workplace and Students for Local Authorities in the United Kingdom Release*, 25th July 2014

(<http://www.ons.gov.uk/ons/rel/census/2011-census/origin-destination-statistics-on-migration--workplace-and-students-for-local-authorities-in-the-united-kingdom/sum---commuting-patterns-in-the-uk--2011.html>)

- 4.17 Figure 2 below shows the commuter flow data for the number of people coming in to East Herts to work and those going out from East Herts to work in other local authorities. As can be seen from the diagram, the residents and the workers in East Herts commute to and commute from the neighbouring authorities with a large number travelling to London.

Figure 2: Travel Flow within area (Census 2011)



Socio-cultural profile

- 4.18 Of the 326 local authorities in England, East Herts is ranked as the 14th least deprived (The English Indices of Multiple Deprivation, 2010, DCLG), although there are some areas within it that are less affluent.
- 4.19 In terms of the **crime** rate in the district, the police recorded crime rate for five key offences are shown in Table 9 below. The data shows that the crime rate for each of the headline offences except for vehicle offences increased in East Herts during the

monitoring year. However the crime rate per 1000 population for each of the offences is still recorded as lower, or equal, to that of Hertfordshire as a whole.

Table 9: Recorded crime for headline offences 2013/14

	East Herts			Hertfordshire	
	Total offences 2012/13	Total offences 2013/14	% change between the two time periods	Offences per 1,000 population 2013/14	Offences per 1,000 population 2013/14
Violence against persons	766	786	3	6	7
Sexual offences	52	78	50	1	1
Robbery	22	26	-	0	0
Burglary	618	718	16	5	5
Vehicle offences	678	618	-9	4	5

Source: ONS, 2014 (<http://www.ons.gov.uk/ons/rel/crime-stats/crime-statistics/period-ending-march-2014/sty-police-recorded-crime.html>)

Health Profile¹

- 4.20 The health of people in East Herts is better than the England average. Deprivation is lower than average; however about 9.1% (2,400) of children live in poverty. Life expectancy for both men and women is higher than the England average. However, men living in the most deprived areas of East Herts have an average life expectancy that measures 3.4 years lower than that of men living in the least deprived areas. In year 6, 11.7% (162) children are classified as obese which is lower than the England average. Local priorities highlighted in the profile include reducing obesity and promoting increased physical activity levels, helping the expanding older population maintain their health and continuing to reduce the levels of smoking.

Housing profile

- 4.21 Table 10 shows the housing tenure of the existing housing stock in the district. As can be seen, the majority of the dwellings are in the private sector.

¹ Health Profile – East Hertfordshire 2014, Public Health England
(http://www.apho.org.uk/default.aspx?QN=HP_METADATA&AreaID=50474)

Table 10: Dwelling stock: No. of dwellings by tenure in East Herts

	LA (incl. owned by other LAs)	Private Registered Provider / Housing Association	Other Public Sector	Private Sector	Total
2009	5	7,482 (HA)	50	50,070	57,610
2010	16	7,556 (HA)	50	50,490	58,110
2011	15	7,515 (HA)	50	50,770	58,350
2012	20	7,640	50	51,020	58,730
2013	20	7,750	50	51,620	59,430

Source: DCLG, Live Table Tenure, Table No. 100, 2014 (<https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

House Price Index Data

4.22 Table 11 below shows that the average price of all house types has increased from the last monitoring year. It is likely that house prices in the district will continue to fluctuate given the unpredictable economic climate. However, average house prices in the district still remain significantly above the national average creating issues of affordability.

Table 11: House Prices in East Herts by dwelling type

Average Prices (£)	Detached	Semi-detached	Terraced	Flats/Maisonettes	All house types
Jan-Mar 13 (Q01)	488,900	310,800	258,200	186,500	298,600
Apr-Jun 13 (Q02)	577,800	305,100	256,500	186,600	334,600
July-Sept 13 (Q03)	546,500	342,400	265,000	184,300	337,600
Oct-Dec 13 (Q04)	544,900	336,700	265,700	184,600	320,700
2013 Average	539,525	323,750	261,350	185,500	322,875
Jan-Mar 14 (Q01)	542,600	344,100	294,600	203,600	338,300
2012 Average	525,000	305,000	258,325	184,925	318,313
% Change from 2012 average	2.77%	6.15%	1.17%	0.31%	1.43%

Source: Herts Local Information System (HertsLIS) website

(<http://atlas.hertslis.org/IAS/dataviews/tabular?viewId=977&geold=15&subsetId=>)

Environment profile

4.23 East Hertfordshire is characterised by the quality, nature and extent of the historic buildings, within its boundary. The centres of all five main towns, as well as 37

villages, are designated as Conservation Areas, reflecting the special architectural and historic value of the District's built environment.

- 4.24 The District is largely made up of arable and urban areas (71% of the total area), with grassland (17%) and woodland (9%, over half of which is classified as ancient²) making up most of the remainder. Sites of international importance within the District comprise a Special Protection Area (SPA) and a Wetland of International Importance (Ramsar Site) in the Lea Valley (Rye Meads and Amwell Quarry) and a Special Area of Conservation (SAC) at Wormley-Hoddesdonpark Woods (part of which is also designated a National Nature Reserve; the only one in Hertfordshire). East Hertfordshire has 16 Sites of Special Scientific Interest (SSSI), the most significant of which are Wormley-Hoddesdonpark Woods and Rye Meads. In addition, there are 544 locally designated Wildlife Sites covering a total area of 3,442 hectares as well as a Local Nature Reserve at Waterford Heath. The towns and villages of East Hertfordshire are also rich in natural habitats, particularly cemeteries in Hertford and Bishop's Stortford, and the grounds of Hertford Castle³.

Green Belt

- 4.25 There has not been an amendment made to the amount of Green Belt land in the district in the monitoring year. The latest statistics published on 16th October 2014 for the monitoring period show that there is 17,530 Ha of Green Belt in the district, which is the same as that in the monitoring period 2012/13.

Table 12: Green Belt Statistics for 2013-14

	2013-14	2012-13
East Hertfordshire	17,530 hectares	17,530 hectares
England	1,638,610	1,639,160

Source: Green Belt estimates as at 31st March 2014 and March 2013 (<https://www.gov.uk/government/statistics/local-authority-green-belt-statistics-for-england-2013-to-2014>)

² Ancient Woodland Inventory, English Nature

³ Information for this paragraph came from 'A Habitat Survey for East Hertfordshire District', Herts Biological Records Centre in conjunction with the Herts and Middlesex Wildlife Trust, 1998 and information on the number of Wildlife Sites in 2014 supplied by the HBRC.

SECTION TWO – INDICATORS FROM THE NEW REGULATIONS



5. INDICATORS FROM NEW REGULATIONS

- 5.1 This section contains the series of indicators that are required to be monitored and reported by local authorities in line with the latest regulations. These indicators include: monitoring the progress of the development plan against the LDS, the progress made on Neighbourhood Planning, actions taken under the Duty to Cooperate and the progression of the Community Infrastructure Levy (CIL).

Local Development Scheme

- 5.2 One of the main aims of the AMR is to monitor and report on the progress made by the Council in producing the documents set out in the Local Development Scheme (LDS). Version 5 of the LDS which took effect from December 2013 is the current LDS used by the Council and is also being used to report on the progress made in the monitoring year. The only Development Plan Document (DPD) scheduled in the LDS is the District Plan. The production of the Draft District Plan Preferred Options consultation document along with the Policies Map was in alignment with the timeline outlined in the LDS. The draft District Plan Preferred Options consultation document and Policies Map were subject to a 12 week period of public consultation commencing in February 2014. The schedule on the following page sets out the current timetable for the preparation of the East Herts District Plan.

Table 13: Progress against the LDS

Tasks in the Timetable	Stage reached as at 31 st March 2014	In line with LDS Version 5?	Reasons for deviation from the timetable
District Plan	Draft District Plan Preferred Options Consultation Document agreed by Council		N/A
	Public consultation carried out		N/A

Schedule – Version 5 (December 2013)

Year	2008												2009											
Month	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
District Plan																								

Year	2010												2011											
Month	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
District Plan																								

Year	2012												2013											
Month	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
District Plan																								

Year	2014												2015											
Month	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
District Plan																			*	*				

Year	2016												2017											
Month	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
District Plan																								

Key to Stages

	Awareness Raising		Issues & Options		Preferred Strategy / Allocations &		Public Consultation
	Pre-Submission		Submission & Examination		Adoption	*	Examination

Neighbourhood Planning

- 5.3 The concept of Neighbourhood Planning was introduced in 2011 by the Localism Act. Although preparing a Neighbourhood Plan is not compulsory, it helps give the local community the opportunity to have a say in the development of their local area. Neighbourhood Plans have to be in general conformity with the District Plan and the National Planning Policy Framework (NPPF). An adopted Neighbourhood Plan sits alongside the District Plan or the Local Plan saved policies at current stage and forms part of the overall Development Plan in determining the planning applications for its area.
- 5.4 Within East Herts, there has been a very positive response to Neighbourhood Planning and on-going effort and enthusiasm can be seen across the district in the towns and parishes that have embarked on this new level of planning. Table 14 on pg. 23 of this report shows the progress achieved in the production of Neighbourhood Plans in the monitoring year. The table records when each Neighbourhood Plan reaches key steps in the process, as set out in the Neighbourhood Plan regulations. These stages are:
- Date designation of Neighbourhood Area agreed – the neighbourhood area is the area to which the proposed Neighbourhood Plan will relate. 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.
 - Date Regulation 14 consultation commences – prior to submitting the final version of the Neighbourhood Plan to East Herts Council, a six week period of pre-submission public consultation is required to be carried out.
 - Date Regulation 16 consultation commences – following receipt of the final version of the Neighbourhood Plan, East Herts Council are required to publish the Plan for a further six week period of public consultation.
 - Date Examination commences – examination may consist of the submission of written representations to the Examiner or a public hearing.
 - Date of Referendum – a referendum is required to gauge community support for the Neighbourhood Plan.
 - Date of Adoption – the Neighbourhood Plan will become part of the statutory development plan against which relevant planning applications will be determined.
- 5.5 In the monitoring year, the stage of pre-submission consultation (Regulation 14) was reached by the Bishop's Stortford Silverleys and Meads Neighbourhood Plan. In addition, East Herts Council agreed to designate neighbourhood areas for Hertford Heath and Brickendon Liberty.

- 5.6 Further up to date information regarding progress in the production of Neighbourhood Plans can be found at www.eastherts.gov.uk/neighbourhoodplanning.

Table 14: Progress in the production of Neighbourhood Plans (achievements in the monitoring year appear in bold/red text)

Neighbourhood Plan Area	Designation of Neighbourhood area agreed	Regulation 14 consultation commencement	Regulation 16 consultation commencement	Examination commencement	Referendum	Adoption
Bishop's Stortford Silverleys and Meads	4 th Dec 2012	1st Feb 2014	-	-	-	-
Hertford Heath	4th Feb 2014	-	-	-	-	-
Brickendon Liberty	4th Mar 2014	-	-	-	-	-

Duty to Cooperate

- 5.7 The current legislation (Localism Act 2011) and the NPPF place a high importance on the 'Duty to Cooperate' (DtC) with neighbouring authorities in relation to planning matters that cross administrative boundaries. It is a statutory requirement for the local authorities to engage proactively on strategic issues with neighbouring authorities and other prescribed public bodies in the Town and Country Planning (Local Planning) (England) Regulations 2012 including the Environment Agency, English Heritage, Natural England, Civil Aviation Authority and Highways Authority. Engagement is required from the onset of the plan-making process and local authorities failing to demonstrate the on-going "duty" by failing to constructively engage with other bodies in the formative stages of plan-making may fail the test of soundness when the Plan reaches examination.
- 5.8 As part of the Council's on-going commitment to meeting the requirements of the NPPF, a number of meetings with neighbouring local planning authorities have taken place and will continue to take place.
- 5.9 The meetings with adjoining authorities have taken place at Member level, with the Executive Member for Strategic Planning and Transport representing East Herts Council, accompanied by Officers.
- 5.10 East Herts District Council has engaged with the following neighbouring authorities in the monitoring year under the Duty to Cooperate:
1. North Hertfordshire District Council – April 2013, March 2014
 2. Stevenage Borough Council – June 2013, February 2014
 3. Harlow Council – September 2013
 4. Epping Forest District Council – October 2013
 5. Uttlesford District Council – October 2013
 6. Broxbourne District Council – November 2013
 7. Welwyn Hatfield – December 2013
- 5.11 The minutes of all the Duty to Cooperate meetings are reported to the District Planning Executive Panel. A 'live' list of meetings with neighbouring authorities can be found at www.eastherts.gov.uk/dutytooperate. This webpage will continue to be updated following engagement with external partners and bodies.
- 5.12 The Council is one of the 11 participants in the Hertfordshire Infrastructure Planning Partnership (HIPP). A Memorandum of Understanding (MoU) was signed in July 2013 which sought 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.

Community Infrastructure Levy

- 5.13 Initial technical work towards producing the Community Infrastructure Levy (CIL) is being undertaken as part of the Delivery Study, a key technical report that will inform the District Plan.
- 5.14 Once the Council has agreed the principle of adopting a CIL, a timetable will be established against which progress will be monitored. Details of CIL receipts and expenditure will be monitored once the CIL has been adopted.

SECTION 3: GROWTH / CHANGES IN THE DISTRICT IN THE MONITORING YEAR

- 6.0 This section deals with the changes in the District in terms of development in the monitoring year. The section places special emphasis on the housing growth in the monitoring year along with the determination of the five year land supply in the district. The other areas that the section provides information on include growth and/or changes in – business development, retail and shopping frontages, environment and design, and renewable energy developments.

6. HOUSING GROWTH OR CHANGES IN THE MONITORING YEAR

- 6.1 Meeting the housing requirement in the district is a key requirement. If there is an under-delivery of land for new housing development, then house prices may rise and new households forming within the district may choose to move away. To provide sufficient housing land, that is accessible to and meets the needs of the District's communities during the plan period is one of the key objectives of the Council's housing policies. The existing policies in the Local Plan Second Review 2007 and the emerging District Plan seek to contribute towards this by planning for a sufficient quantity, quality and type of housing in the right locations, taking account of need and demand in the District including affordable housing. It is sought to achieve these aims and objectives in accordance with the provisions of the NPPF by managing the release of land through a phased approach; and through maximising the potential for housing provision on previously developed sites.
- 6.2 This AMR reports on the following areas of housing development:
- Dwelling completions
 - Five-year land supply
 - Affordable housing completions
 - Gypsy and traveller accommodations
 - Housing completions by size and type
 - Residential density
 - Dwellings completed on previously developed land
 - Completions on windfall sites
 - Distribution of new dwellings in the District
 - Local Plan Second Review allocated sites in Phase 1, 2 and 3 with permission pre-March 2014

Plan Period and Housing Targets

- 6.3 Following the withdrawal of the East of England Plan in January 2013, the housing target of 660 dwellings per annum which was contained in that Plan ceased to apply. Since then it has become the responsibility of the local authority to devise its own

housing target based on their requirements and needs. The previous target of 11,000 dwellings in East Herts between 1991 and 2011 contained in the Adopted Local Plan Second Review 2007 is now outdated and hence cannot be considered for determining our future land supplies.

- 6.4 The Draft District Plan which was agreed for public consultation by Council in January 2014, identified a housing requirement of at least 15,000 dwellings to be provided over the 20 year plan period, 2011-2031. This equates to an annual average of 750 dwellings. This figure was derived primarily from the Department for Communities and Local Government (DCLG) 2011 based household projections, but has subsequently been tested against a range of demographic scenarios including the latest sub-national population projections. As this is an up-to-date evidence based target, this figure is being used to monitor housing delivery and calculate future land supply in this monitoring period.
- 6.5 However, it should be noted that the housing requirement of 15,000 dwellings (750 dwellings per annum) is not yet the adopted development plan target and may be subject to change following consideration of further evidence that is likely to be released over the coming year. Any change to the housing requirement figures will be reported and reflected upon in future AMRs and through the plan-making process itself.

Dwelling completions

- 6.6 The table below shows the annual dwelling completions in East Herts since the start of the Plan period in 2011.

Table 15: Dwelling completions since 2011

Monitoring Year	Number of completions
2011/12	383
2012/13	699
2013/14	366
Total completions since 2011	1,448

Source: East Herts Council and Hertfordshire County Council Monitoring (CDP reports), 2014

- 6.7 A total number of 1,448 dwellings have been built since the start of the Plan period and in the monitoring year a total number of 366 dwellings were completed. However, it is anticipated that with the adoption of the District Plan in 2016 which will allocate further sites for development, it may be reasonable to assume that housing completions could increase towards the end of the five year supply period. A

breakdown of the net completion figures for 2011-2014 by parish and settlement is set out in Tables 1 & 2 of Appendix A.

Five year land supply

- 6.8 The NPPF requires the local authority to have a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against housing requirements. The five year land supply is based on certain figures and assumptions. These are:
- the annual housing target of the District;
 - the identified supply of housing sites and an assessment of which of these sites are likely to be delivered within the five years;
 - the shortfall in housing completions since the start of the Plan period and how it will be addressed;
 - and the addition of a buffer of additional sites bought forward from later in the Plan period to ensure choice and competition in the market for land.
- 6.9 Taking the first two of these points, the annual housing target used in the five year land supply calculation is 750 dwellings per annum. The rationale for using this figure is set out in paragraphs 6.3-6.5 of this report on pages 27-28. The table below summarises the identified supply of housing sites which are considered deliverable within the five year period 2015-2020. A full breakdown of the identified housing supply is set out in the Schedule of Housing Commitments in Appendix B.

Table 16: Identified supply of housing sites

Source of Supply	Number of dwellings anticipated
Local Plan Second Review 2007 Allocated Sites under construction/with planning permission (full or outline)	134
Windfall Sites under construction/with planning permission (full or outline)	1387
Windfall Sites subject to S106 agreement	188
Local Plan Second Review 2007 Allocated Sites without planning permission	327
Local Plan Second Review 2007 Areas of Special Restraint & Special Countryside Area	1045
Further Identified Sites	418
Windfall Allowance	270
Total Identified Supply	3769

Source: East Herts Council and Hertfordshire County Council Monitoring (CDP reports), 2014

- 6.10 The shortfall in housing completions since the start of the Plan period needs to be considered in the five year land supply calculation. Table 15 on pg.28 shows that since 2011, a total of 1,448 dwellings have been completed, and the Schedule of Housing Commitments in Appendix B indicates that it is anticipated that a total of 581 dwellings will be completed in the monitoring year 2014-15. Therefore, the estimated total shortfall in housing completions since the start of the Plan period is estimated to be 971 as shown in the table below.

Table 17: Shortfall in housing completions since start of Plan period

Monitoring Year	Shortfall in completions against target of 750 dwellings
2011/12	367
2012/13	51
2013/14	384
2014/15	169 (estimated)
Total estimated shortfall since 2011	971

Source: East Herts Council and Hertfordshire County Council Monitoring (CDP reports), 2014

- 6.11 There are two approaches that can be used to address the shortfall in housing completions. These are:
- the 'Liverpool method' – the shortfall since the start of the Plan period is spread evenly over the remainder of the Plan period.
 - the 'Sedgefield method' – the shortfall since the start of the Plan period is addressed in the next five years (wholly within the five year land supply)

The NPPF and NPPG favour the use of the Sedgefield method as it is more closely aligned with the requirements of the NPPF and the need to boost significantly the supply of housing and remedy the unsatisfactory consequences of persistent under delivery of housing. However, in order to provide a clear picture of the impact of using the different methods on the five year land supply calculation, both methods have been used in the calculation.

Table 18: Additional number of dwellings required per annum using each method

Method	Calculation	Additional number of dwellings required each year
Liverpool method	971/16	60.7
Sedgefield method	971/5	194.2

- 6.12 The NPPF also requires local authorities to provide an additional buffer of at least 5% to ensure choice and competition in the market for land and seek to provide a genuine margin of adequate supply. It should be stressed that this buffer is not an

additional amount on top of the total provision; rather it is moved forward from later in the Plan period. In local authority areas where there is deemed to have been a persistent record of under delivery of housing, the NPPF states that the buffer should be increased to 20%. Again, in order to provide a clear picture of the impact of using either a 5% or 20% buffer on the five year land supply calculation, both levels of buffer have been used in the calculation.

Table 19: Additional number of dwellings required per annum using each buffer

Buffer	Additional number of dwellings required each year
5%	37.5
20%	150

Table 20: Five year land supply calculation using 'Liverpool method'

Buffer	Annual Housing Requirement	Five year housing requirement	Five year land supply calculation
5% buffer	848.2	4241	4.4 years
20% buffer	960.3	4801.5	3.9 years

Table 21: Five year land supply calculation using 'Sedgefield method'

Buffer	Annual Housing Requirement	Five year housing requirement	Five year land supply calculation
5% buffer	981.7	4908.5	3.8 years
20% buffer	1094.2	5471	3.4 years

- 6.13 Tables 20 and 21 show that, irrespective of which method and buffer are used, the Council is unable to demonstrate a five year supply of deliverable housing sites. The appropriate method for addressing the shortfall and the level of buffer to be applied, as well as the allocation of additional housing sites to increase the identified housing supply, will be determined through the District Plan process.

Affordable housing completions

- 6.14 A total number of 68 affordable homes were completed during the monitoring year which represents 17.3% of all completed dwellings in the District. With regard to the amended Local Plan saved policy for affordable housing, the threshold is 4 dwellings or 0.12 hectares for sites in the Category 1 and 2 villages, and 15 dwellings or 0.5 hectares for sites in the six main settlements.

Table 22: Gross Affordable Housing Completions in 2013-14

Total no. of affordable homes	% of total completions	% of completions over threshold
68	17.3%	26.9%

Source: East Herts and Hertfordshire County Council Monitoring, 2014

6.15 The sites where the affordable homes were completed are shown in Table 23 below.

Table 23: Sites where Affordable Homes were completed

Site Name	Settlement	Number of Affordable Units completed
Land off Tylers Close,, West of Greenways	Buntingford	20
Pentlows Farm, The Street	Braughing	10
EHDC Car Park, Baker Street	Hertford	14
Biggles House, 41 Cowbridge	Hertford	2
Land adjacent to The Leventhorpe School, Cambridge Road	Sawbridgeworth	11
Seven Acres,, 49, Upper Green Road, Tewin, AL6 0LE	Tewin	4
Land to south of Station Road	Watton-at-Stone	7

Source: East Herts Council and Hertfordshire County Council Monitoring 2014

Net additional pitches (Gypsy and Traveller)

6.16 The following table shows that a net gain of 5 pitches was provided to meet the needs of gypsies and travellers in the monitoring year.

Table 24: Net additional Gypsy and Traveller pitches provided in 2013-14

Address	No. of pitches
The Stables, Bayford Lane, Bayford	3
Field Farm, Levens Green	2

Source: East Herts and Hertfordshire County Council Monitoring, 2014

Gross housing completions by size and type

6.17 As Chart 11 shows below, 78% of gross completions during the monitoring year were for houses, which is higher than the last monitoring year (47%) (AMR 2012-13). The proportion of flats built in this monitoring year is lower than that in the last

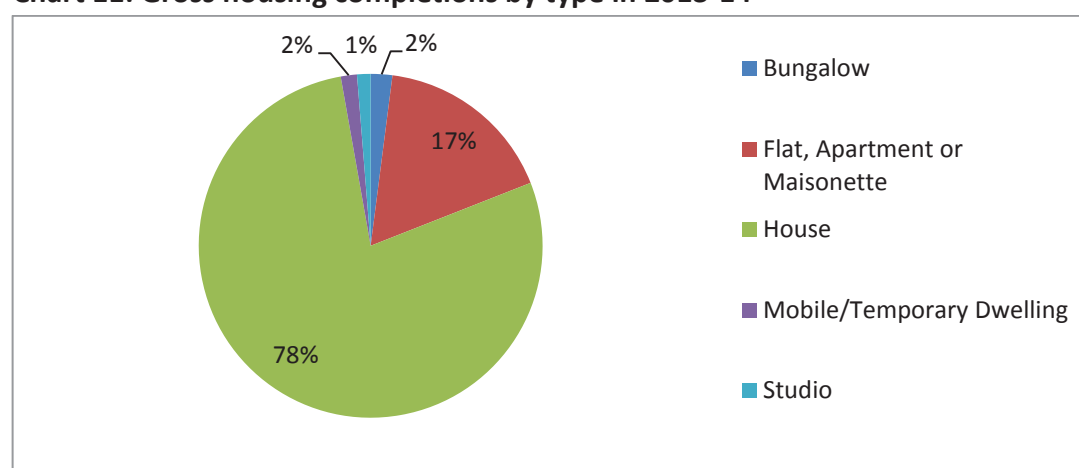
monitoring year (17%). Unlike last year, 60% of gross completions were for 2 or 3 bed units as shown in the table below.

Table 25: Gross housing completions by size and type in 2013-14

Type	1	2	3	4	5+	Total by type
Bungalow	2	3	0	2	1	8
Flat	17	50	0	0	0	67
House	6	58	124	86	34	308
Mobile/Temporary	0	3	0	0	3	6
Studio	5	0	0	0	0	5
Total by size	30	114	124	88	38	394

Source: East Herts and Hertfordshire County Council Monitoring, 2014

Chart 11: Gross housing completions by type in 2013-14



Source: East Herts and Hertfordshire County Council Monitoring, 2014

Residential Density

6.18 According to paragraph 47 of the NPPF, local authorities can set out their own approach to housing density to reflect local circumstances. This approach will be determined through the District Plan process. In the monitoring year, 55.8% of dwellings were completed at a density of over 30 dwellings per hectare.

Table 26: New dwellings completed within defined density ranges in 2013-14

New dwellings (gross) completed at:	Output 2013-14 (Count)	Output 2013-14 (%)
Less than 30 dwellings per hectare	106	26.90%
Between 30 and 50 dwellings per hectare	143	36.29%
Above 50 dwellings per hectare	77	19.54%

Source: East Herts and Hertfordshire County Council Monitoring, 2014

Dwellings completed on previously developed land

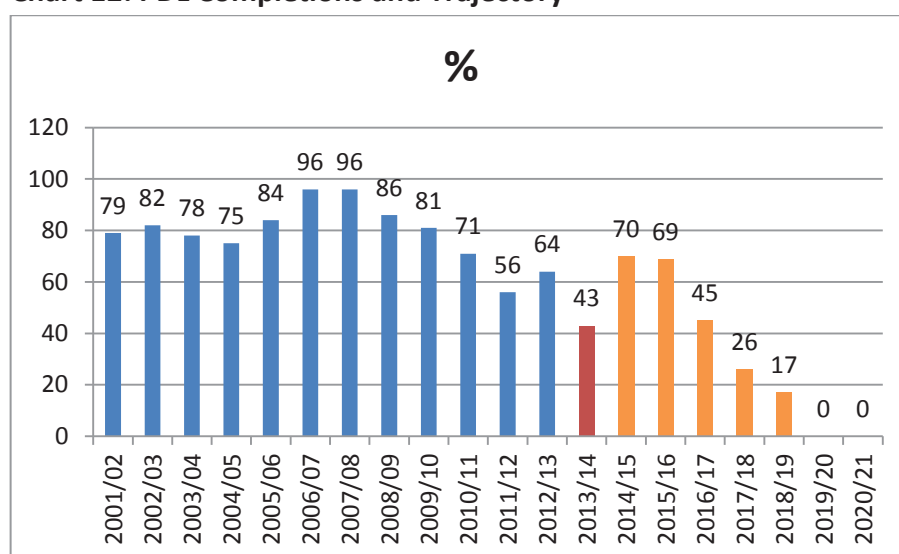
6.19 The table below shows the total number of completions, both **new** and **converted** on previously developed land (PDL). As can be seen in the table, the total number of dwellings completed on previously developed land in 2013-14 is 168 (42.6%).

Table 27: Dwellings completed on Previously Developed Land in 2013-14

Number of Completions (gross)	Completions on PDL (Count)	Completions on PDL (%)
394	168	42.6%

Source: East Herts Council and Hertfordshire County Council Monitoring (CDP reports), 2014

Chart 12: PDL Completions and Trajectory



Source: East Herts Council and Hertfordshire County Council Monitoring (CDP reports), 2014

- 6.20 This is lower than the former government target of 60% for the amount of new housing on PDL. The PDL trajectory indicates that completions on brownfield land are likely to generally fall over the next few years; this is due to the majority of the brownfield allocated sites in the Local Plan having been developed and more sites coming forward for development on greenfield sites on the edges of towns and villages.
- 6.21 In June 2010, the Coalition Government reissued PPS3, reclassifying garden land as greenfield land (non PDL). This classification has been carried forward in the NPPF when it superseded PPS3. Therefore from the 2010-11 monitoring year, planning applications which granted approval on garden land have been classified in the completion figures and PDL trajectory as development on non-previously developed land. Development on garden land makes up a small proportion of the housing land supply so although the number of completions on previously developed land is likely

to fall in future years, the impact of the change to the classification of PDL is not expected to be significant in this regard.

Completions on Windfall Sites per annum

6.22 Windfall sites are those sites which are not allocated in the development plan but which unexpectedly become available for development or re-development. There are two categories of windfall sites; small sites and conversions of four or less units, and large windfall sites of 5 or more units.

Table 28: Completions on windfall sites since 2011-2014

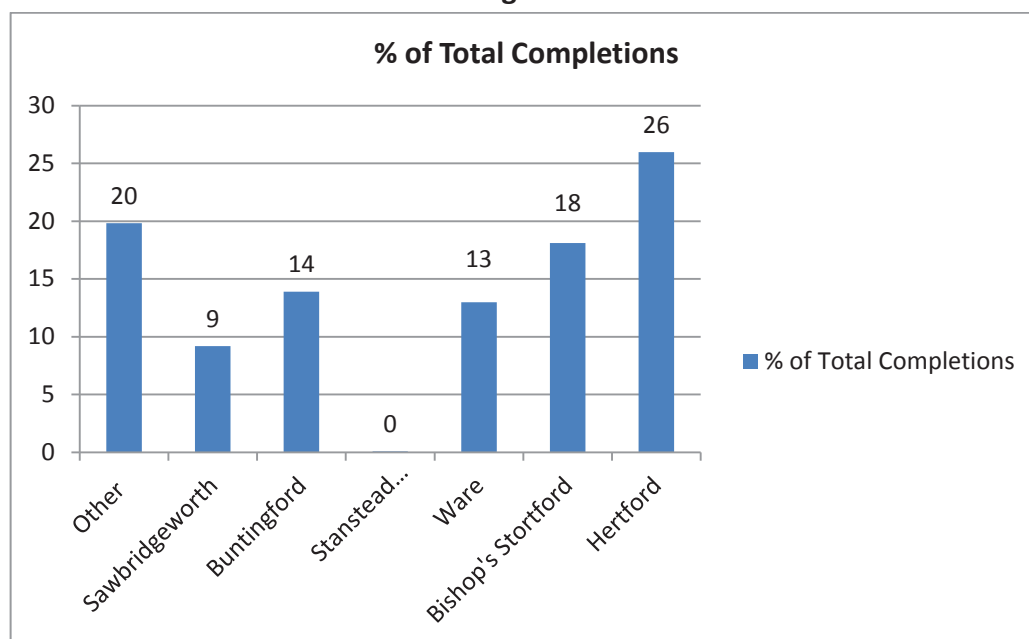
Year	2011/12	2012/13	2013/14	Annual Avg.
Small sites and conversions	58	57	68	61
Large windfall sites	173	323	161	219
Allocated sites	152	319	137	203
Total net completions	383	699	366	483
Windfall completions as % of net total completions	60	54	63	59

Source: East Herts and Hertfordshire County Council Monitoring, 2014

6.23 The table above shows that 59% of all completions since 2011/12 have been on windfall sites. This is due to fact that the majority of the allocated sites in the Local Plan Second Review 2007 have already been bought forward for development and completed. The number of completions on windfall sites is likely to remain at a high level until such time as new sites are allocated for development through the District Plan.

Distribution of new dwellings

6.24 The distribution of new dwellings in the District since the start of the Plan period (2011) is set out in Chart 13 on the following page. As shown in the chart, the highest percentage of new housing development within East Herts since the start of the Plan period has taken place in Hertford (26%). Bishop's Stortford and Buntingford have had 18% and 14% respectively, while Ware has had 13% of new development. Locations outside the six main settlements, including Category 1 villages, have had 20% of new development. Overall 80% of new development has been directed to the District's six main settlements.

Chart 13: Distribution of new dwellings in the District 2011-2014

Source: East Herts and Hertfordshire County Council Monitoring, 2014

Number of Second Review allocated sites in Phase 1, 2 and 3 with permission pre-March 31 2014

6.25 The aim of this indicator is to monitor the phasing of the sites in the Local Plan Second Review, in line with the 'plan, monitor, manage' approach. There are five Phase 1 allocated sites that have yet to receive planning permission. There were no changes to the Phase 2 sites during the monitoring year, with one outstanding site remaining. Phase 3 sites have all been brought forward for development and the Bishop's Stortford Areas of Special Restraint and Special Countryside Area are in the process of being brought forward for development as monitoring has indicated that they are required to meet the districts housing target.

Table 29: Local Plan Second Review allocated sites with planning permission as at 31st March 2014

Phase	No. of sites in Phase	No. of sites with permission
Phase 1 – Brownfield	36	33
Phase 1 – Part Brownfield/Part Greenfield	4	3
Phase 1 – Greenfield	14	13
Phase 2 (post 2006)	3	2
Phase 3 (Reserve Housing Land)	3	3
ASRs 1 – 5 and Special Countryside Area (post 2006)	6	0

Source: East Herts and Hertfordshire County Council Monitoring

7. ECONOMIC DEVELOPMENT AND EMPLOYMENT

7.1 The NPPF highlights the principle of achieving a sustainable economy and acknowledges the economic role of the planning system in achieving sustainable development. Local Plans have an important role to play in achieving this aim by ensuring their policies meet the needs of the economy whilst at the same time securing effective protection of the environment and achieving a sustainable pattern of development. Monitoring employment land supply ensures that the needs of businesses in the area will be met. The emerging District Plan and the Local Plan policies aim to achieve a sustainable economy in the District by encouraging a strong and diverse local economy with a wide range of employment opportunities, whilst ensuring effective protection and enhancement of the environment and the prudent use of resources. The following indicators monitor the amount of floorspace developed for employment by type; in Employment Areas; on Previously Developed Land etc.

Amount of floorspace developed for employment by type

7.2 The following indicator monitors the amount of gross completed floorspace development for employment, by the type of Use Class. It is not always possible to determine, from existing data, the breakdown between the B1 Business Uses. Where this data is available it has been separated out and the remaining information has been classed as B1. A relatively large amount of growth has occurred in developments with B1(a) Use Class followed by B8 and B1(b) uses.

Table 30: Floorspace developed for employment by type

Type of employment (by Use Class)	Gross Output (sq. m)
B1 – Business (split unknown)	488
B1 (a) – Offices	2,730
B1 (b) – Research and Development	40
B1 (c) – Light Industry	552
B2 – General Industry	190
B8 – Storage or Distribution	979
Total	4,979

Source: East Herts and Hertfordshire County Council Monitoring

Amount of floorspace developed for employment by type in Employment Areas

7.3 This indicator measures the amount of gross new and converted employment floorspace in the Adopted Local Plan Employment Areas. About 12.5% of the employment floorspace developed has been within allocated Employment Areas.

Table 31: Amount of floorspace developed for employment by type in Employment Areas

Type of employment (by Use Class)	Gross Output (sq. m)
B1 – Business (split unknown)	0
B1 (a) – Offices	0
B1 (b) – Research and Development	40
B1 (c) – Light Industry	0
B2 – General Industry	190
B8 – Storage or Distribution	393
Total	623

Source: East Herts and Hertfordshire County Council Monitoring (All data is specified as square metres or hectares and measurements are not confirmed as gross internal floorspace)

Amount of floorspace by employment type, which is on previously developed land

- 7.4 This indicator measures the amount of completed employment floorspace in the monitoring year which is on previously developed land (PDL). As shown in the table below, over the monitoring year, 18% of employment floorspace was provided on previously developed land, unlike in 2012-13 during which 92% of employment floorspace was provided on previously developed land.

Table 32: Amount of floorspace on previously developed land

Type of employment (by Use Class)	Gross Output (sq. m)	Percentage
B1 – Business (split unknown)	0	0%
B1 (a) – Offices	273	5.50%
B1 (b) – Research and Development	40	0.80%
B1 (c) – Light Industry	0	0%
B2 – General Industry	190	3.82%
B8 – Storage or Distribution	393	7.90%
Total	896	18.00%

Source: East Herts and Hertfordshire County Council Monitoring (All data is specified as square metres and measurements are not confirmed as gross internal floorspace)

Employment land available by type (land available for employment use)

- 7.5 This indicator measures the amount of land (in hectares) which is available for employment use. This is defined as (i) sites defined and allocated in the Adopted Local Plan, and (ii) sites for which planning permission has been granted (all 'B' Use Classes) (including those within allocated Employment Areas). The table below shows that there are about 25 hectares of land available for employment in East Herts District, the majority of which have permission for B8 and B1(a) use.

Table 33: Employment land available by type

Type of employment	(i) Estimated allocations (hectares)	(ii) Employment land with permission (hectares)	Total land for employment use (hectares)
B1 – Business (split unknown)	1.22	2.45	3.67
B1 (a) – Offices	0	7.74	7.74
B1 (b) – Research and Development	0	0.49	0.49
B1 (c) – Light Industry	0	0.34	0.34
B2 – General Industry	0	0.52	0.52
B8 – Storage or Distribution	0	12.0	12.0
B1-B8 (split unknown) (B Various)	0	1.45	1.45
Total	1.22	24.99	26.21

Source: East Herts and Hertfordshire County Council Monitoring

Total amount of floorspace for ‘town centre uses’

7.6 This indicator monitors the amount of completed floorspace (gross and net) for town centre uses within (i) town centre area and (ii) the local authority area. The Adopted Local Plan does not identify boundaries for any of the town centres in the District. As part of a study undertaken in 2008 to inform the Local Development Framework, town centre boundaries were proposed for each of the District’s five main settlements. The formal town centre boundaries will be identified by the District Council through the oncoming District Plan. In the interim period, the suggested boundaries in the Retail Study have been utilised for the purposes of monitoring. As shown in the table below, a total amount of 212m² floorspace was completed in the District whilst there was a loss of 1575m² in the town centre areas.

Table 34: Amount of floorspace completed in town centre in 2013-14

Type of employment	Total floorspace completed in town centres (m ²)		Total net floorspace completed in District (m ²)	
	Gross	Net	Gross	Net
A1	680	-332	2160	854
A2	163	-513	163	-678
B1 (a)	25	-730	2730	-3227
D2	0	0	4191	3263
Total	868	-1575	9244	212

Source: East Herts and Hertfordshire County Council Monitoring

8. SHOPPING AND TOWN CENTRES

- 8.1 The indicators in this section monitor the provision of local services within town centres. This includes retail, office and leisure development in the town centres. Town centres provide a wide range of shopping facilities and other services, generally well located for use by the whole community and accessible by a range of modes of transport.
- 8.2 The District Council is therefore, concerned not only to maintain, but to enhance the vitality and viability of its town centres. In particular, it is keen to protect the key shopping and trading role of towns in East Hertfordshire, whilst at the same time encouraging the integration of other functions, such as community uses, services, leisure and entertainment. Mixed use developments will be encouraged in town centres as will complementary evening and night-time economy uses, where appropriate.

Percentage of primary and secondary frontage in each main settlement and smaller centres in A1 (Shop) Use Class

- 8.3 This indicator monitors the primary and secondary shopping frontages in the main settlements in East Hertfordshire. This is to ensure that the frontages remain primarily in retail use and that the vitality and viability of town centres is maintained. From the table below, it can be seen that the units in primary frontages in the towns of Bishop's Stortford and Ware are primarily in A1 use – 77% and 60% respectively. Hertford has 48%% of units in the primary frontages in A1 use.

Table 35: Percentage of primary and secondary frontage in each main settlement and smaller centres in A1 Use Class

Settlement	Primary %	Secondary %
Bishop's Stortford	77	53
Hertford	48	53
Ware	60	31
Sawbridgeworth	N/A *	40
Buntingford	N/A *	48
Stanstead Abbots	N/A *	25

Source: East Herts Council 2014

* Not Applicable – Smaller centres do not have defined primary frontages

Vacant shops

- 8.4 The number of vacant units in the retail frontages tends to vary from year to year. The data from this monitoring year shows that there has been an increase in the number of vacant units from the last monitoring year in Bishop's Stortford and

Hertford, whilst the number of vacant units in secondary shopping frontage has reduced from that in last year.

Table 36: Percentage of vacant shop units in Primary and Secondary Frontages

Settlement	Primary %	Secondary %
Bishop's Stortford	12	19
Hertford	12	7
Ware	7	7
Sawbridgeworth	N/A *	8
Buntingford	N/A *	2
Stanstead Abbots	N/A *	4

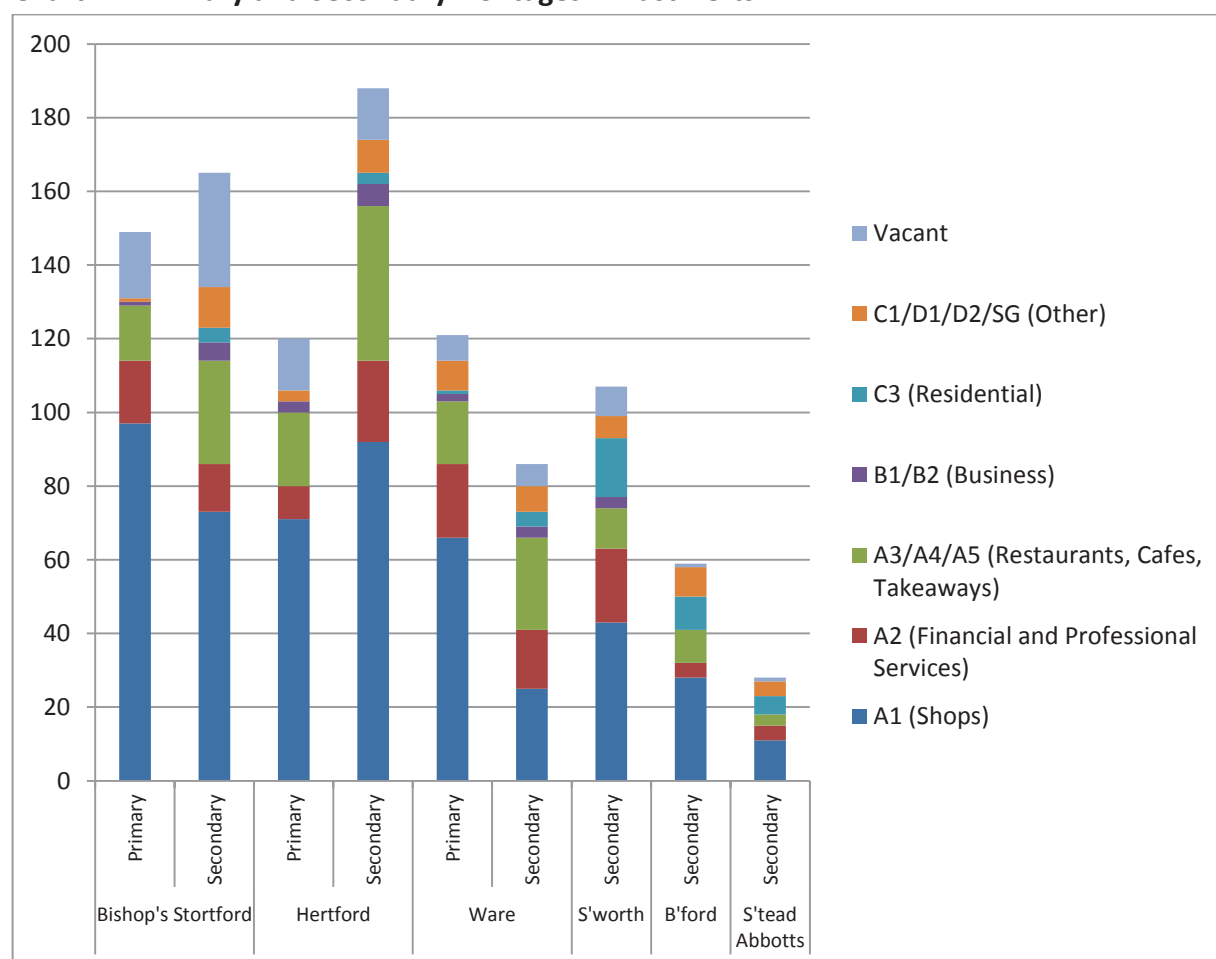
Source: East Herts Council 2014

* Not Applicable – Smaller centres do not have defined primary frontages

Breakdown by Use Class of premises in Primary and Secondary shopping frontages

8.5 The following chart shows the shopping frontages in the five main settlements for different Use Class

Chart 14: Primary and Secondary frontages in East Herts



Source: East Herts Council 2014

9. ENVIRONMENT AND DESIGN

- 9.1 East Hertfordshire District is under continuing pressure for development, as a result of evolving and changing community needs for homes, jobs, leisure and community facilities. The main development strategy of the Local Plan and that of the emerging District Plan is to concentrate and direct development to the main towns, with limited development taking place in some smaller settlements.
- 9.2 The Local Plan and the District Plan have a key role to play in making proper provision, in a sustainable way, for the necessary needs of the present and future generations, whilst at the same time protecting the environment and amenity. Meeting the housing needs of the District will result in development of higher densities than previously, and some release of Green Belt/greenfield land. It is, therefore, important that the quality of what is built is of the highest standard possible, and that the natural and built environment is conserved and enhanced, for the benefit of present and future generations.

Change in areas and populations of biodiversity importance

- 9.3 The Hertfordshire Biological Records Centre (HBRC) has continued to improve their reporting on biodiversity indicators over last few years. Major site area changes shown below are due to the addition of a new wildlife site in East Hertfordshire District. In this monitoring year, the only change recorded was to the wildlife sites. According to the data in the table below, there is currently 3,442 hectares of land recorded on 544 wildlife sites in the District. This represents an increase of 0.94 ha of land on the previously recorded output. This change is due to the selection of one new wildlife site (Quin Eastern Meadow).

Table 37: Change in areas and populations of biodiversity importance

Type of site	2013		2014	
	No. of sites	Area (Ha)	No. of sites	Area (Ha)
Ramsar/SPA	1	451.29	1	451.29
SAC	1	336.47	1	336.47
National Nature Reserve	1	239.4	1	239.4
Sites of Special Scientific Interest	16	519.04	16	519.04
Wildlife Site	543	3441	544	3441.94
Local Nature Reserve	1	35.24	1	35.24

Source: East Herts and Hertfordshire County Council Monitoring 2014

10. RENEWABLE ENERGY

10.1 The Local Plan and the emerging District Plan aim to promote development that makes the most efficient use of resources, including land, water, energy and other resources and encourage the generation of renewable energy within the District. The following table includes data on permissions granted and the completions with renewable energy generation in the monitoring year. A total of 39 permissions were granted with renewable energy generation facilities.

Table 38: Renewable energy generation facilities permitted in 2013-14

Renewable energy facility	No. of schemes	Capacity (kW)
Air Source Heat Pump	4	28
Biomass heating	2	0
Combined Heat and Power	1	0
Ground Source Heating	2	0
Solar Energy	28	248
Solar water heating	2	0
Total	39	276

Source: East Herts and Hertfordshire County Council Monitoring 2014

10.2 The following table shows the completions with renewable energy generation facilities in the monitoring year with a total capacity of 51kW in the District.

Table 39: Completions with renewable power in 2013-14

Address	Renewable Power Source	Description	Capacity (kW)	Code for Sustainable Homes Rating
Glaxosmithkline Services Ltd, Priory Street, Ware	Other	CHP	0	
Land adjacent to The Leventhorpe School, Cambridge Road, Sawbridgeworth	Ground Source Heating		0	
Land adjacent to The Leventhorpe School, Cambridge Road, Sawbridgeworth,	Solar Power (PV)		0	
15 Currie Street (Talbot Place), Hertford				3. 57 to 67 points
Four Acres, New Road, Little Hadham	Ground Source Heating		0	3. 57 to 67 points

Address	Renewable Power Source	Description	Capacity (kW)	Code for Sustainable Homes Rating
Four Acres, New Road, Little Hadham	Solar Panel (Unknown)		0	3. 57 to 67 points
2 Railway Place, Hertford	Solar Power (PV)		0	
2 Railway Place, Hertford	Solar Water Heating		0	
Land adjacent to Fox Rock, 18 Morgans Road, Hertford				4. 68 to 83 points
The Railway Inn, 1 London Road, Buntingford				3. 57 to 67 points
Land adjacent to 10 School Lane, Tewin				4. 68 to 83 points
The Slough, Slough Road, Allens Green	Other	Air source heat pump	0	3. 57 to 67 points
Land adjacent to 42 Hoddesdon Road, Stanstead Abbots	Solar Power (PV)		7	
Land adjacent to 42 Hoddesdon Road, Stanstead Abbots	Other	Windcatcher	0	
Lordship Farm, Walkern Road, Benington	Solar Power (PV)		44	
Total			51	

Source: East Herts and Hertfordshire County Council Monitoring 2014

- 10.3 The results for this indicator should be treated carefully as the majority of small scale household renewable energy systems do not need planning permission so will therefore not be recorded. The Council will be working with Hertfordshire County Council to improve monitoring of this indicator in future years.

11. GREEN BELT AND COUNTRYSIDE

- 11.1 The Metropolitan Green Belt in East Hertfordshire covers approximately the southern third of the District, with northern extensions paralleling the A1 and M11 transport corridors. It secures the containment of the settlements of Bishop's Stortford, Hertford, Ware, Sawbridgeworth and Stanstead Abbots, as well as larger villages such as Watton-at-Stone.
- 11.2 The remaining central and northern two-thirds of the District are located in the Rural Area Beyond the Green Belt, where the policy is of similar strong restraint on development, and protection of the Countryside. This Rural Area contains the town of Buntingford, as well as numerous villages. This parallel policy has been in place since 1981 when the first East Herts Local Plan was adopted.
- 11.3 The NPPF places a high importance to the Green Belt stating that the fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open. All of the five purposes of the Green Belt are relevant to East Hertfordshire district. These are:
- To check the unrestricted sprawl of large built-up areas;
 - To prevent neighbouring towns from merging into one another;
 - To assist in safeguarding the countryside from encroachment;
 - To preserve the setting and special character of historic towns; and
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 11.4 The Local Plan and the emerging District Plan aim to protect, preserve and enhance the quality and character of the countryside whilst meeting the needs of the people in a sustainable manner ensuring vital and viable communities.

New development in the Green Belt and the countryside

- 11.5 This indicator monitors the new development in the Green Belt approved as a departure and referred to the Secretary of State. This helps monitor the success of Green Belt and Rural Area Beyond the Green Belt policies in protecting the Green Belt and the countryside from inappropriate development.
- 11.6 There were no major departures from the Local Plan with regard to the Green Belt or the Rural Area Beyond the Green Belt that was contrary to policy.

Table 40: New development in the Green Belt approved as a departure 2013-14 and referred to the Secretary of State

Green Belt	Target	Output	Performance
Number of applications	0	0	😊

Source: East Herts Council, 2014

Table 41: New development in the Rural Area Beyond the Green Belt approved as a departure 2013-14 and referred to the Secretary of State

Rural Area Beyond the Green Belt	Target	Output	Performance
Number of applications	0	0	😊

Source: East Herts Council, 2014

APPENDIX A HOUSING COMPLETIONS BY PARISHES AND SETTLEMENTS

Table 1: East Herts Housing Completions (net) 2011-2014

	11/12	12/13	13/14	TOTAL
TOWNS/PARISHES OF:				
Bishop's Stortford	29	211	22	262
Buntingford	93	18	90	201
Hertford	137	165	74	376
Sawbridgeworth	55	47	31	133
Ware	9	141	38	188
PARISHES OF:				
Albury	0	0	0	0
Anstey	6	3	0	9
Ardeley	0	1	0	1
Aspenden	0	-1	1	0
Aston	0	0	-1	-1
Bayford	2	0	2	4
Bengeo Rural	0	0	0	0
Benington	1	1	0	2
Bramfield	0	0	0	0
Braughing	1	16	22	39
Brent Pelham	0	0	0	0
Brickendon Liberty	1	9	2	12
Buckland	0	0	2	2
Cottered	1	0	2	3
Datchworth	1	1	0	2
Eastwick	0	0	0	0
Furneux Pelham	0	-1	1	0
Gilston	0	0	0	0
Great Amwell	0	0	1	1
Great Munden	1	0	3	4
Hertford Heath	20	-1	3	22
Hertingfordbury	4	-1	0	3
High Wych	1	6	3	10
Hormead	2	0	1	3
Hunsdon	5	18	0	23
Little Berkhamsted	0	0	0	0
Little Hadham	-1	0	2	1
Little Munden	0	0	0	0
Meesden	0	-1	1	0
Much Hadham	0	0	1	1
Sacombe	1	0	-2	-1
Standon	0	0	4	4
Stanstead Abbots	0	0	1	1
Stanstead St Margarets	0	0	0	0
Stapleford	0	0	0	0
Stocking Pelham	-1	0	0	-1
Tewin	2	3	13	18
Thorley	0	0	0	0
Thundridge	0	1	1	2
Walkern	0	1	2	3
Wareside	0	0	3	3
Watton-at-Stone	14	58	43	115
Westmill	0	0	0	0
Widford	-1	3	0	2
Wyddial	0	1	0	1
TOTALS	383	699	366	1,448

Source: East Herts Council and Hertfordshire County Council Monitoring 2014

Table 2: East Hertfordshire Housing Completions (net) by settlement 2011-2014

Settlement figures provided for six main settlements and Category 1 villages

	11/12	12/13	13/14	TOTAL
SETTLEMENT OF:				
Bishop's Stortford	26	210	22	258
Buntingford	93	15	90	198
Hertford	49	39	74	162
Sawbridgeworth	15	47	31	93
Stanstead Abbots/St Margarets	0	1	1	2
Ware	8	141	38	187
CATEGORY 1 VILLAGES OF:				
Braughing	1	16	22	39
Hertford Heath	18	-1	1	18
High Cross	0	0	0	0
Hunsdon	4	18	0	22
Much Hadham	0	0	0	0
Puckeridge	0	0	2	2
Tewin	1	3	14	18
Walkern	0	1	2	3
Watton-at-Stone	9	58	43	110
Other Villages/Hamlets	159	151	26	336
TOTALS	383	699	366	1,448

APPENDIX B SCHEDULE OF HOUSING COMMITMENTS

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	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG	
	Planning Application Ref	Current Status of Permission or Site	LP Alloc	Decision Date	Lapse Date	Address		Town	POL	Area	Gain Total	Loss Total	Total number of net dwellings proposed	Gain Complete	Loss Complete	Total number of net completions to date	Gain Outstanding	Loss Outstanding	Total residual number of dwellings under construction, permitted/ allocated*	Number expected to be completed in Years 1-5	2014/15 current year	2016/16	2016/17	2017/18	2018/19	2019/20	2020/21 2024/25	2025/26- 2029/30	Total Identified Supply**	Available	Suitable	Achievable	Comments	
1																																		
2																																		
3	Extant Planning Permissions on Allocated Large Sites																																	
4	3112209FP	Development in progress	Y	19/12/2012	19/12/2015	Perilous Farm	The Street	Braughing	N	2.730	28	0	28	22	0	22	6	0	6	0	6								28	Yes	Yes	Yes	Work has commenced on site	
5	3130813OP	Outline permission (known details)	Y	11/04/2014	11/04/2017	Land north of Park Farm Industrial Estate		Buntingford	N	0.222	13	0	13	0	0	0	13	0	13	13	13			13					13	Yes	Yes	Yes	Expected to come forward within 5 year period	
6	3101147FN	Development in progress	Y	24/07/2013	24/07/2016	Land Off Marshgate Drive		Hertford	Y	0.873	182	0	182	0	0	0	182	0	182	99	83	99							182	Yes	Yes	Yes	Work has commenced on site	
7	3131088MA	Detailed permission not started	Y	15/07/2013	15/07/2016	Adams Yard	Bull Plain	Hertford	Y	0.118	8	0	8	0	0	0	8	0	8	8	8		8						8	Yes	Yes	Yes	Expected to come forward within 5 year period	
8	3130343SV	Development in progress	Y	27/08/2013	06/06/2014	Wallace Land	Buntingford Road	Puckeridge	N	1.540	58	0	58	0	0	0	58	0	58	0	58								58	Yes	Yes	Yes	Work has commenced on site	
9	3121804RP	Development in progress	Y	09/01/2013	09/01/2016	Land East of Trinity Centre		Ware	N	1.820	81	0	81	8	0	8	73	0	73	0	73								81	Yes	Yes	Yes	Work has commenced on site	
10	3130513FP	Detailed permission not started	Y	03/12/2013	03/12/2016	Star Street (Co-op Depot)	Star Street	Ware	Y	0.132	14	0	14	0	0	0	14	0	14	14	14		14						14	Yes	Yes	Yes	Expected to come forward within 5 year period	
11	3110872RP	Development in progress	Y	20/07/2011	20/07/2014	Land south of Station Road		Walton-at-Stone	N	2.409	111	0	111	106	0	106	5	0	5	0	5								111	Yes	Yes	Yes	Work has commenced on site	
12	Extant Planning Permissions on Unallocated Large Sites																																	
14	3130964FP	Development in progress	N	02/07/2013	02/07/2016	Alchemist Works	Whempstead Road	Benington	Y	0.290	5	0	5	0	0	0	5	0	5	5	5								5	Yes	Yes	Yes	Work has commenced on site	
15	31212154FP	Development in progress	N	19/06/2013	19/06/2016	71.77 South Street	South Street	Bishop's Stortford	Y	0.31	53	0	53	0	0	0	53	0	53	53	53		53						53	Yes	Yes	Yes	Work has commenced on site	
16	3130527FP	Development in progress	N	27/11/2013	27/11/2016	Pearse House	Parsonage Lane	Bishop's Stortford	Y	0.8	22	0	22	0	0	0	22	0	22	7	15	7							22	Yes	Yes	Yes	Work has commenced on site	
17	3101098FP	Development in progress	N	24/01/2011	24/01/2014	Widham Hall	Widham Road	Bishop's Stortford	N	2.107	6	0	6	0	0	0	6	0	6	6	6		6						6	Yes	Yes	Yes	Work has commenced on site	
18	3111475FO	Development in progress	N	24/10/2011	24/10/2014	27.27A Northgate End		Bishop's Stortford	Y	0.080	5	0	5	0	0	0	5	0	5	0	5								5	Yes	Yes	Yes	Work has commenced on site	
19	3100598FN	Detailed permission not started	N	23/05/2011	23/05/2014	The Dells and 3A South Street		Bishop's Stortford	Y	0.098	18	0	18	0	0	0	18	0	18	18	18		18						18	Yes	Yes	Yes	Expected to come forward within 5 year period	
20	3130278FP	Detailed permission not started	N	19/06/2013	19/06/2016	2nd & 3rd floor, Millars Three	Southmill Road	Bishop's Stortford	Y	0.045	10	0	10	0	0	0	10	0	10	10	10		10						10	Yes	Yes	Yes	Expected to come forward within 5 year period	
21	3130101FP	Detailed permission not started	N	22/05/2013	22/05/2016	The Red Cow & land R/O 58 Dunmow Road		Bishop's Stortford	Y	0.125	8	0	8	0	0	0	8	0	8	8	8		8						8	Yes	Yes	Yes	Expected to come forward within 5 year period	
22	3130274FP	Detailed permission not started	N	12/04/2013	12/04/2016	Buildings north & west of courtyard, The George Hotel	North Street	Bishop's Stortford	Y	0.010	7	0	7	0	0	0	7	0	7	7	7		7						7	Yes	Yes	Yes	Expected to come forward within 5 year period	
23	3131520FP	Detailed permission not started	N	13/03/2014	13/03/2017	Land at Jeans Lane	Bells Hill	Bishop's Stortford	Y	0.290	7	0	7	0	0	0	7	0	7	7	7		7						7	Yes	Yes	Yes	Expected to come forward within 5 year period	
24	3120472FP	Detailed permission not started	N	01/06/2012	01/06/2015	R/O 3 South Street		Bishop's Stortford	Y	0.020	6	0	6	0	0	0	6	0	6	6	6		6						6	Yes	Yes	Yes	Expected to come forward within 5 year period	
25	3131622FP	Detailed permission not started	N	23/12/2013	23/12/2016	Land R/O 39 South Street		Bishop's Stortford	Y	0.000	6	0	6	0	0	0	6	0	6	6	6		6						6	Yes	Yes	Yes	Expected to come forward within 5 year period	
26	3131538PO	Prior Approval	N	19/09/2013	30/09/2016	R/O 6 High Street		Bishop's Stortford	Y	0.051	6	0	6	0	0	0	6	0	6	6	6		6						6	Yes	Yes	Yes	Expected to come forward within 5 year period	
27	3101964OP	Outline permission (known details)	N	14/01/2013	14/01/2016	Old River Lane	Causeway	Bishop's Stortford	Y	6.400	100	3	97	0	0	0	100	3	97	97	97				48	49			97	Yes	Yes	Yes	Expected to come forward within 5 year period	
28	3121417RP	Development in progress	N	07/10/2013	07/10/2016	Land off Longmead		Buntingford	N	1.150	26	0	26	0	0	0	26	0	26	13	13	13							26	Yes	Yes	Yes	Work has commenced on site	
29	3112108FP	Development in progress	N	01/02/2012	01/02/2015	The Red House	84 High Street	Buntingford	Y	0.100	8	0	8	0	0	0	8	0	8	3	5	3							8	Yes	Yes	Yes	Work has commenced on site	
30	3131000FP	Detailed permission not started	N	24/01/2014	24/01/2016	Land north of Hare Street Road		Buntingford	N	8.600	180	0	180	0	0	0	180	0	180	180	180		40	60	80				180	Yes	Yes	Yes	Expected to come forward within 5 year period	
31	3130118OP	Outline permission (known details)	N	24/01/2014	24/01/2017	Land south of Hare Street Road		Buntingford	N	4.960	100	0	100	0	0	0	100	0	100	100	100			33	33	34			100	Yes	Yes	Yes	Expected to come forward within 5 year period	
32	3131294OP	Outline permission (known details)	N	07/10/2013	07/10/2016	Applewood	7 Ermine Street	Buntingford	Y	0.250	7	1	6	0	0	0	7	1	6	6	6								6	Yes	Yes	Yes	Expected to come forward within 5 year period	
33	3131215RP	Development in progress	N	06/11/2013	06/11/2016	Terlings Park	Eastwick Road	Eastwick	Y	11.700	200	0	200	0	0	0	200	0	200	180	20	70	70	40				200	Yes	Yes	Yes	Yes	Work has commenced on site	
34	3120299FN	Detailed permission not started	N	20/06/2012	20/06/2015	Libury Hall		Great Munden	Y	1.300	5	0	5	0	0	0	5	0	5	5	5		5						5	Yes	Yes	Yes	Expected to come forward within 5 year period	
35	3121632FO	Development in progress	N	15/02/2013	06/09/2014	Hertford Police Station	Ware Road	Hertford	Y	1.900	126	0	126	30	0	30	96	0	96	0	96								126	Yes	Yes	Yes	Work has commenced on site	
36	3131497FP	Development in progress	N	13/06/2014	13/06/2017	Former Hertford Police Station	Ware Road	Hertford	Y	0.536	85	0	85	0	0	0	85	0	85	85	85		85						85	Yes	Yes	Yes	Work has commenced on site	
37	3071647FP	Development in progress	N	15/11/2007	15/11/2010	Former Dolphin PH Car Park	Mill Road	Hertford	Y	0.116	14	0	14	0	0	0	14	0	14	14	14		14						14	Yes	Yes	Yes	Work has commenced on site	
38	3130946FP	Development in progress	N	15/11/2013	15/11/2016	Buildings 6 & 7 Bluecoats Avenue		Hertford	Y	0.206	14	0	14	0	0	0	14	0	14	14	14		14						14	Yes	Yes	Yes	Work has commenced on site	
39	3131218FO	Development in progress	N	12/02/2014	12/02/2017	Beesons Yard	72 Railway Street	Hertford	Y	0.072	9	0	9	0	0	0	9	0	9	9	9		9						9	Yes	Yes	Yes	Yes	Work has commenced on site
40	3130914FP	Development in progress	N	25/09/2013	25/09/2016	Garage site	Lawrence Close	Hertford	Y	0.390	7	0	7	0	0	0	7	0	7	0	7								7	Yes	Yes	Yes	Yes	Work has commenced on site

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG	
1	Planning Application Ref	Current Status of Permission or Site	LP Alloc	Decision Date	Lapse Date	Address		Town	POL	Area	Gain Total	Loss Total	Total number of net dwellings proposed	Gain Complete	Loss Complete	Total number of net completions to date	Gain Outstanding	Loss Outstanding	Total residual number of dwellings under construction, permitted/ allocated*	Number expected to be completed in Years 1-5	2014/15 current year	2019/16	2019/17	2017/18	2018/19	2019/20	2020/21-2024/25	2025/26-2029/30	Total Identified Supply**	Available	Suitable	Achievable	Comments	
41	313/1450/PO	Development in progress	N	27/09/2013	27/09/2016	15-17 Maidenhead Street		Hertford	Y	0.027	6	0	6	0	0	0	6	0	6	0	6								6	Yes	Yes	Yes	Work has commenced on site	
42	314/0590/FP	Detailed permission not started	N	12/11/2014	12/11/2017	Land to south of Mead Lane	Mead Lane	Hertford	Y		107	0	107	0	0	0	107	0	107	107			36	35	36				107	Yes	Yes	Yes	Expected to come forward within 5 year period	
43	313/1967/FP	Detailed permission not started	N	24/10/2014	24/10/2017	Sovereign House	Hale Road	Hertford	Y	0.370	84	0	84	0	0	0	84	0	84	84					42	42				84	Yes	Yes	Yes	Expected to come forward within 5 year period
44	311/1616/FP	Detailed permission not started	Y	14/02/2014	14/02/2017	306-310 Ware Road		Hertford	Y	0.800	14	1	13	0	0	0	14	1	13	13					13					13	Yes	Yes	Yes	Expected to come forward within 5 year period
45	311/1308/FN	Detailed permission not started	N	20/09/2011	20/09/2014	65 Railway Street		Hertford	Y	0.034	8	0	8	0	0	0	8	0	8	8			8							8	Yes	Yes	Yes	Expected to come forward within 5 year period
46	312/0824/FP	Detailed permission not started	N	11/07/2012	11/07/2015	8 Railway Street		Hertford	Y	0.022	7	0	7	0	0	0	7	0	7	7			7							7	Yes	Yes	Yes	Expected to come forward within 5 year period
47	313/1666/FP	Detailed permission not started	N	14/11/2013	14/11/2016	Garage site rear of 1-5 Hawthorn Close, 65-69 Tudor Way and adj. 24-28 Holly Croft		Hertford	Y	0.210	7	0	7	0	0	0	7	0	7	7			7							7	Yes	Yes	Yes	Expected to come forward within 5 year period
48	313/0900/FP	Detailed permission not started	N	08/07/2013	08/07/2016	79-83 Railway Street		Hertford	Y	0.153	6	0	6	0	0	0	6	0	6	6				6						6	Yes	Yes	Yes	Expected to come forward within 5 year period
49	314/0269/FP	Detailed permission not started	N	28/04/2014	28/04/2017	Graham House	57 Molewood Road	Hertford	Y	0.173	5	0	5	0	0	0	5	0	5	5			5							5	Yes	Yes	Yes	Expected to come forward within 5 year period
50	313/1491/PO	Prior Approval	N	13/09/2013	30/05/2016	Four Rivers House	3-4 Fendimen Walk	Hertford	Y	0.033	6	0	6	0	0	0	6	0	6	0	6								6	Yes	Yes	Yes	Expected to come forward within 5 year period	
51	310/1758/FP	Development in progress	N	15/12/2010	15/12/2013	Nine Acres	High Road	High Cross	N	0.474	6	0	6	0	0	0	6	0	6	0	6								6	Yes	Yes	Yes	Work has commenced on site	
52	312/1075/FP	Development in progress	N	09/04/2013	09/04/2016	Home Farm, Moor Place	Kettle Green Road	Much Hadham	Y	8.200	11	0	11	0	0	0	11	0	11	0	11								11	Yes	Yes	Yes	Work has commenced on site	
53	311/2227/FP	Development in progress	N	12/03/2012	12/03/2015	Market House Hotel	42 Knight Street	Sawbridgeworth	Y	0.068	6	0	6	0	0	0	6	0	6	0	6								6	Yes	Yes	Yes	Work has commenced on site	
54	3104/2375/FP	Development in progress	N	17/01/2007	12/12/2010	Scout Land	Springhall Road	Sawbridgeworth	Y	0.299	5	0	5	0	0	0	5	0	5	3	2	3								5	Yes	Yes	Yes	Work has commenced on site
55	313/1041/PO	Prior Approval	N	01/08/2013	01/08/2016	Suite 2, Plymouth House	The Square	Sawbridgeworth	Y	0.028	5	0	5	0	0	0	5	0	5	5			5							5	Yes	Yes	Yes	Expected to come forward within 5 year period
56	313/1360/FP	Development in progress	N	24/09/2013	24/09/2016	Garage site	Chapelfield	Stansted Abbots	Y	0.133	6	0	6	0	0	0	6	0	6	6			6							6	Yes	Yes	Yes	Work has commenced on site
57	312/0597/FP	Development in progress	N	19/10/2012	19/10/2015	Seven Acres	49 Upper Green Road	Tewin	Y	1.037	28	1	27	16	1	15	12	0	12	0	12								27	Yes	Yes	Yes	Work has commenced on site	
58	312/1190/FP	Development in progress	N	27/02/2013	27/02/2016	R/O 17-28 Grass Warren		Tewin	Y	0.295	8	0	8	0	0	0	8	0	8	0	8								8	Yes	Yes	Yes	Work has commenced on site	
59	310/0572/FO 313/0849/FP	Development in progress	N	24/05/2010	24/05/2013	Home Farm		Walden	N	0.327	9	0	9	0	0	0	9	0	9	0	9								9	Yes	Yes	Yes	Work has commenced on site	
60	310/0380/FP	Development in progress	N	26/07/2011	26/07/2014	Cirlet site	Watton Road	Ware	Y	2.150	13	0	13	0	0	0	13	0	13	13			13							13	Yes	Yes	Yes	Work has commenced on site
61	312/1955/FP	Development in progress	N	14/08/2013	14/08/2016	Former Musley Infants School	Musley Hill	Ware	Y	0.248	7	0	7	0	0	0	7	0	7	7			7							7	Yes	Yes	Yes	Work has commenced on site
62	313/0906/FP	Development in progress	N	30/08/2013	30/08/2016	London Road (adjacent to New River Court)	London Road	Ware	N	0.243	6	0	6	0	0	0	6	0	6	0	6								6	Yes	Yes	Yes	Work has commenced on site	
63	313/1860/FP	Detailed permission not started	N	31/01/2014	31/01/2017	The Central Millings	New Road	Ware	Y	0.170	12	0	12	0	0	0	12	0	12	12									12	Yes	Yes	Yes	Expected to come forward within 5 year period	
64	313/1973/FP	Detailed permission not started	N	19/12/2013	19/12/2016	Garage site and grassed area	Francis Road	Ware	Y	0.231	6	0	6	0	0	0	6	0	6	6			6							6	Yes	Yes	Yes	Expected to come forward within 5 year period
65	313/0946/PO	Prior Approval	N	17/07/2013	30/05/2016	High Oak House	Collett Road	Ware	Y	0.108	9	0	9	0	0	0	9	0	9	9			9							9	Yes	Yes	Yes	Expected to come forward within 5 year period
66	312/1325/FP	Detailed permission not started	N	07/11/2012	07/11/2015	Priory Farm	Hunsdon Road	Widford	Y	0.270	6	0	6	0	0	0	6	0	6	6			6							6	Yes	Yes	Yes	Expected to come forward within 5 year period
67	67 Extant Planning Permissions on Small Sites (if large number of sites totals can be used rather than a full list of sites)																																	
69	313/1659/FP	Detailed permission not started	N	10/12/2013	10/12/2016	The Botby	Albury Hall Park	Albury	Y	0.880	1	1	0	0	0	0	1	1	0	0			-1	1						0	Yes	Yes	Yes	n/a
70	311/1389/FP	Detailed permission not started	N	12/10/2011	12/10/2014	Primrose Cottage	Slough Road	Alfens Green	Y	0.108	2	1	1	0	0	0	2	1	1	1			1							1	Yes	Yes	Yes	n/a
71	313/1240/FP	Detailed permission not started	N	05/09/2013	05/09/2016	The Old Bell	Moor Green Road	Ardeley	Y	0.306	1	0	1	0	0	0	1	0	1	1				1						1	Yes	Yes	Yes	n/a
72	313/2048/FP	Detailed permission not started	N	17/01/2014	17/01/2017	Bury Grange Farm		Ardeley	Y	0.120	1	1	0	0	0	0	1	1	0	0			-1	1						0	Yes	Yes	Yes	n/a
73	311/2230/FP	Development in progress	N	20/03/2012	20/03/2015	Wahringsa	The Street	Aspenden	Y	64.000	1	1	0	0	1	-1	1	0	1	0	1								0	Yes	Yes	Yes	n/a	
74	309/1978/FP	Development in progress	N	01/02/2010	01/02/2013	Land Off Yeomans Drive		Aston	N	0.291	1	0	1	0	0	0	1	0	1	0	1								1	Yes	Yes	Yes	n/a	
75	312/2047/FP	Detailed permission not started	N	01/02/2013	01/02/2016	Garage site adj. 33 & 37 Brook Field		Aston	Y	0.090	2	0	2	0	0	0	2	0	2	2			2							2	Yes	Yes	Yes	n/a
76	313/1418/OP	Outline permission (known details)	N	01/10/2013	01/10/2016	64 Long Lane		Aston	Y	0.092	1	1	0	0	1	-1	1	0	1	1				1						0	Yes	Yes	Yes	n/a
77	313/1314/FP	Development in progress	N	11/09/2013	11/09/2016	The Tiled Barn, Great Barwick Manor	Gore Lane	Barwick	Y	0.098	1	0	1	0	0	0	1	0	1	0	1								1	Yes	Yes	Yes	n/a	

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG
	Planning Application Ref	Current Status of Permission or Site	LP Alloc	Decision Date	Lapse Date	Address	Town	PDL	Area	Gain Total	Loss Total	Total number of net dwellings proposed	Gain Complete	Loss Complete	Total number of net completions to date	Gain Outstanding	Loss Outstanding	Total residual number of dwellings under construction, permitted/allocated*	Number expected to be completed in Years 1-5	2014/15 current year	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21 - 2024/25	2025/26 - 2029/30	Total Identified Supply**	Available	Suitable	Achievable	Comments	
1																																	
78	3/12/1490FP	Development in progress	N	06/11/2012	06/11/2015	1 & 2 Penny Royal	Buckley Alley	Bayford	Y	0.100	2	2	0	0	2	-2	2	0	2	0	2								0	Yes	Yes	Yes	n/a
79	3/13/1815FP	Detained permission not started	N	03/12/2013	03/12/2016	Ashdene Stud	White Stubbs Lane	Bayford	N	0.200	1	1	0	0	0	0	1	1	0	0		-1	1					0	Yes	Yes	Yes	n/a	
80	3/13/2184FP	Detained permission not started	N	06/02/2014	06/02/2017	The Directors House, Bayfordbury	Lower Hatfield Road	Bayford	Y	0.350	1	1	0	0	0	0	1	1	0	0		-1	1					0	Yes	Yes	Yes	n/a	
81	3/12/0672FP	Detained permission not started	N	19/06/2012	19/06/2015	Place Farm	Bayford Green	Bayford	N	0.030	1	0	1	0	0	0	1	0	1	1	1	1						1	Yes	Yes	Yes	n/a	
82	3/12/0661FP	Development in progress	N	01/03/2013	01/03/2016	New Mead Nursery	Walters Road	Berlington	N	0.550	4	0	4	0	0	0	4	0	4	0	4							4	Yes	Yes	Yes	n/a	
83	3/11/1610FP	Development in progress	N	23/11/2011	23/11/2014	44 Walters Road		Berlington	Y	0.084	1	0	1	0	0	0	1	0	1	0	1							1	Yes	Yes	Yes	n/a	
84	3/13/0893FO	Development in progress	N	25/06/2013	25/06/2016	Berlington Bury Farm	Walters Road	Berlington	N	0.081	1	0	1	0	0	0	1	0	1	0	1							1	Yes	Yes	Yes	n/a	
85	3/13/1188FP	Development in progress	N	22/08/2013	22/08/2016	2 Blacksmiths Hill		Berlington	Y	0.033	2	1	1	0	0	0	2	1	1	0	1							1	Yes	Yes	Yes	n/a	
86	3/12/1716FP	Detained permission not started	N	20/12/2012	20/12/2015	Land between 13-19 and 21-27 Blacksmiths Hill		Berlington	Y	0.050	2	0	2	0	0	0	2	0	2	2	2		2						2	Yes	Yes	Yes	n/a
87	3/12/1862FP	Detained permission not started	N	21/12/2012	21/12/2015	Garage site adj. 39-41 Blacksmiths Hill		Berlington	Y	0.050	2	0	2	0	0	0	2	0	2	2	2		2						2	Yes	Yes	Yes	n/a
88	3/13/1671FP 3/13/1672FP 3/14/0216FP 3/14/0472FP	Development in progress	N	15/11/2013	15/11/2016	Whitehall Leys	Whitehall Road	Bishop's Stortford	N	0.800	4	0	4	0	0	0	4	0	4	0	4							4	Yes	Yes	Yes	n/a	
89	3/07/1718FP	Development in progress	N	08/10/2007	08/10/2010	72 South Street		Bishop's Stortford	Y	0.022	3	0	3	2	0	2	1	0	1	0	1							3	Yes	Yes	Yes	n/a	
90	3/11/0441FP	Development in progress	N	09/05/2011	09/05/2014	79 Haywards Lane		Bishop's Stortford	Y	0.400	4	1	3	1	0	1	3	1	2	3	-1	3						3	Yes	Yes	Yes	n/a	
91	3/12/0198FP	Development in progress	N	04/04/2012	04/04/2015	R/O 35 London Road		Bishop's Stortford	N	0.023	2	0	2	0	0	0	2	0	2	0	2							2	Yes	Yes	Yes	n/a	
92	3/11/2230FP	Development in progress	N	21/09/2012	21/09/2015	199 London Road		Bishop's Stortford	N	0.120	2	0	2	1	0	1	1	0	1	0	1							2	Yes	Yes	Yes	n/a	
93	3/12/1112FP	Development in progress	N	10/10/2012	10/10/2015	R/O 102 Dunmow Road		Bishop's Stortford	Y	0.087	2	1	1	0	1	-1	2	0	2	0	2							1	Yes	Yes	Yes	n/a	
94	3/04/1073FP	Development in progress	N	26/07/2004	26/07/2009	13 Elizabeth Road		Bishop's Stortford	Y	0.048	2	1	1	0	0	0	2	1	1	0	1							1	Yes	Yes	Yes	n/a	
95	3/04/1461FP	Development in progress	N	21/10/2004	21/10/2009	9-11 Northgate End		Bishop's Stortford	Y	0.009	2	1	1	0	0	0	2	1	1	0	1							1	Yes	Yes	Yes	n/a	
96	3/13/1198FP	Development in progress	N	28/08/2013	28/08/2016	Land adj. 14 Park Avenue		Bishop's Stortford	N	0.019	1	0	1	0	0	0	1	0	1	0	1							1	Yes	Yes	Yes	n/a	
97	3/12/0095FP	Development in progress	N	12/11/2012	12/11/2015	Adj. 22 Flaw Hatch Close		Bishop's Stortford	N	0.070	1	0	1	0	0	0	1	0	1	0	1							1	Yes	Yes	Yes	n/a	
98	3/12/0063FP	Development in progress	N	22/06/2012	22/06/2015	62 South Street		Bishop's Stortford	Y	0.010	2	1	1	0	0	0	2	1	1	0	1							1	Yes	Yes	Yes	n/a	
99	3/13/1198FP	Development in progress	N	28/08/2013	28/08/2016	Dane O'Coys Farm House	Dane O'Coys Road	Bishop's Stortford	Y	0.063	1	0	1	0	0	0	1	0	1	0	1							1	Yes	Yes	Yes	n/a	
100	3/11/1521FP	Development in progress	N	06/12/2012	06/12/2015	2 Maple Avenue		Bishop's Stortford	Y	0.124	1	1	0	0	1	-1	1	0	1	0	1							0	Yes	Yes	Yes	n/a	
101	3/12/0598FP	Development in progress	N	14/03/2013	14/03/2016	5-7 Kingsbridge Road		Bishop's Stortford	Y	0.110	1	2	-1	0	2	-2	1	0	1	0	1							-1	Yes	Yes	Yes	n/a	
102	3/12/0375FN	Detained permission not started	N	23/05/2012	23/05/2015	Thorley Place	Thorley Lane East	Bishop's Stortford	Y	0.550	5	1	4	0	0	0	5	1	4	4	4		4					4	Yes	Yes	Yes	n/a	
103	3/13/1014FP	Detained permission not started	N	04/09/2013	04/09/2016	17 The Old Millings		Bishop's Stortford	Y	0.012	4	0	4	0	0	0	4	0	4	4	4		4					4	Yes	Yes	Yes	n/a	
104	3/11/0326FN	Detained permission not started	N	27/04/2011	27/04/2014	R/O 48-50 Hockerill Street		Bishop's Stortford	Y	0.005	3	0	3	0	0	0	3	0	3	3	3		3					3	Yes	Yes	Yes	n/a	
105	3/12/0904FP	Detained permission not started	N	13/06/2012	13/06/2015	22 North Street		Bishop's Stortford	Y	0.014	3	0	3	0	0	0	3	0	3	3	3			3				3	Yes	Yes	Yes	n/a	
106	3/13/1708FP	Detained permission not started	N	27/11/2013	27/11/2016	Adj. 11 Showley Parade		Bishop's Stortford	N	0.013	3	0	3	0	0	0	3	0	3	3	3			3				3	Yes	Yes	Yes	n/a	
107	3/13/1336FP	Detained permission not started	N	25/02/2014	25/02/2017	Garage site north of 26 Northolt Avenue		Bishop's Stortford	Y	0.050	3	0	3	0	0	0	3	0	3	3	3		3						3	Yes	Yes	Yes	n/a
108	3/13/2113FP	Detained permission not started	N	28/03/2014	28/03/2017	Denny	Galloway Road	Bishop's Stortford	Y	0.148	3	0	3	0	0	0	3	0	3	3	3			3				3	Yes	Yes	Yes	n/a	
109	3/12/0844FP	Detained permission not started	N	12/07/2012	12/07/2015	35 Potter Street		Bishop's Stortford	Y	0.020	2	0	2	0	0	0	2	0	2	2	2		2						2	Yes	Yes	Yes	n/a
110	3/12/1209FP	Detained permission not started	N	06/09/2012	06/09/2015	16 Maple Avenue		Bishop's Stortford	Y	0.306	3	1	2	0	0	0	3	1	2	2	2		-1	3				2	Yes	Yes	Yes	n/a	
111	3/13/0348FP	Detained permission not started	N	28/02/2013	28/02/2016	78 Northgate End		Bishop's Stortford	Y	0.008	2	0	2	0	0	0	2	0	2	2	2			2				2	Yes	Yes	Yes	n/a	
112	3/13/0480FP	Detained permission not started	N	15/05/2013	15/05/2016	Fairway	Haywards Lane	Bishop's Stortford	Y	0.180	3	1	2	0	0	0	3	1	2	2	2		-1	3				2	Yes	Yes	Yes	n/a	
113	3/12/1860FP	Detained permission not started	N	09/10/2013	09/10/2016	Garage site east of Fintlands	Fintlands	Bishop's Stortford	Y	0.040	2	0	2	0	0	0	2	0	2	2	2		2						2	Yes	Yes	Yes	n/a
114	3/13/1862FP	Detained permission not started	N	30/12/2013	30/12/2016	21 Hockerill Court	London Road	Bishop's Stortford	Y	0.010	2	0	2	0	0	0	2	0	2	2	2			2				2	Yes	Yes	Yes	n/a	
115	3/13/1920FP	Detained permission not started	N	02/01/2014	02/01/2017	258 Hockerill Street		Bishop's Stortford	Y	0.013	2	0	2	0	0	0	2	0	2	2	2			2				2	Yes	Yes	Yes	n/a	

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG	
	Planning Application Ref	Current Status of Permission or Site	LP Alloc	Decision Date	Lapse Date	Address		Town	POL	Area	Gain Total	Loss Total	Total number of net dwellings proposed	Gain Complete	Loss Complete	Total number of net completions to date	Gain Outstanding	Loss Outstanding	Total residual number of dwellings under construction, permitted / allocated*	Number expected to be completed in Years 1-5	2016/15 current year	2016/16	2016/17	2017/18	2018/19	2019/20	2020/21 - 2024/25	2025/26 - 2029/30	Total Identified Supply**	Available	Suitable	Achievable	Comments	
1																																		
116	3131161FP	Detained permission not started	N	25/02/2014	26/02/2017	Garage site east of 48 Northolt Avenue	Northolt Avenue	Bishop's Stortford	Y	0.120	2	0	2	0	0	0	2	0	2	2		2								2	Yes	Yes	Yes	n/a
117	3131330FP	Detained permission not started	N	25/02/2014	26/02/2017	Garage site east of Galtwick Close	Galtwick Close	Bishop's Stortford	Y	0.040	2	0	2	0	0	0	2	0	2	2		2								2	Yes	Yes	Yes	n/a
118	3131331FP	Detained permission not started	N	25/02/2014	25/02/2017	Land north of 38 Galtwick Close		Bishop's Stortford	Y	0.030	2	0	2	0	0	0	2	0	2	2		2								2	Yes	Yes	Yes	n/a
119	3090836FP	Detained permission not started	N	14/06/2010	14/06/2013	31 Nightingales		Bishop's Stortford	Y	0.014	2	1	1	0	0	0	2	1	1	0	1									1	Yes	Yes	Yes	n/a
120	3100472FP	Detained permission not started	N	12/11/2010	12/11/2013	32 Redwood Court	Hamsteads Lane	Bishop's Stortford	Y	0.014	2	1	1	0	0	0	2	1	1	0	1									1	Yes	Yes	Yes	n/a
121	3110865FN	Detained permission not started	N	15/07/2011	15/07/2014	Adj. 38 East Road	R/O 77 Warwick Road	Bishop's Stortford	N	0.030	1	0	1	0	0	0	1	0	1	1		1								1	Yes	Yes	Yes	n/a
122	3111585FP	Detained permission not started	N	07/12/2011	07/12/2014	Adj. 7 Plaw Hatch Close		Bishop's Stortford	N	0.018	1	0	1	0	0	0	1	0	1	1		1								1	Yes	Yes	Yes	n/a
123	3111790FN	Detained permission not started	N	08/12/2011	08/12/2014	23 Northgate End		Bishop's Stortford	Y	0.008	2	1	1	0	0	0	2	1	1	1		1								1	Yes	Yes	Yes	n/a
124	3111226FP	Detained permission not started	N	03/12/2012	03/12/2015	Adj. 6 Woodpecker Close		Bishop's Stortford	N	0.015	1	0	1	0	0	0	1	0	1	1		1								1	Yes	Yes	Yes	n/a
125	31310591FP	Detained permission not started	N	13/06/2013	13/06/2016	Adj. 14 Plaw Hatch Close		Bishop's Stortford	N	0.046	1	0	1	0	0	0	1	0	1	1										1	Yes	Yes	Yes	n/a
126	3131289FP	Detained permission not started	N	04/09/2013	04/09/2016	100 Rye Street		Bishop's Stortford	Y	0.230	2	1	1	0	0	0	2	1	1	1		-1	2							1	Yes	Yes	Yes	n/a
127	3131480FP	Detained permission not started	N	05/11/2013	05/11/2016	Adj. 2 Maple Avenue		Bishop's Stortford	N	0.091	1	0	1	0	0	0	1	0	1	1										1	Yes	Yes	Yes	n/a
128	3131769FP	Detained permission not started	N	08/01/2014	08/01/2017	11 Dane O'Cove Road		Bishop's Stortford	Y	0.201	2	1	1	0	0	0	2	1	1	1		-1	2							1	Yes	Yes	Yes	n/a
129	3140162FP	Detained permission not started	N	01/04/2014	01/04/2017	The Archers	Hawes Lane	Bishop's Stortford	Y	0.090	1	0	1	0	0	0	1	0	1	1										1	Yes	Yes	Yes	n/a
130	31116779FN	Detained permission not started	N	13/07/2011	13/07/2014	62 Hawes Lane		Bishop's Stortford	Y	0.018	1	1	0	0	0	0	1	1	0	0		-1	1							0	Yes	Yes	Yes	n/a
131	31410236FP	Detained permission not started	N	31/03/2014	31/03/2017	40 Mare Green Road		Bishop's Stortford	Y	0.168	1	1	0	0	0	0	1	1	0	0		-1	1							0	Yes	Yes	Yes	n/a
132	3131722FP	Prior Approval	N	18/11/2013	30/05/2016	Thorley Wash Barrs	Thorley Wash	Bishop's Stortford	Y	0.146	3	0	3	0	0	0	3	0	3	3		3								3	Yes	Yes	Yes	n/a
133	31110262FP	Development in progress	N	12/10/2011	12/10/2014	Woodlands	Frans Road	Braughing Frans	Y	1.500	1	0	1	0	0	0	1	0	1	0	1									1	Yes	Yes	Yes	n/a
134	3120506FP	Development in progress	N	01/06/2012	01/06/2015	90 Green End		Braughing	N	0.320	1	0	1	0	0	0	1	0	1	0	1									1	Yes	Yes	Yes	n/a
135	3131887FP	Development in progress	N	18/12/2013	18/12/2016	Land R/O 50 Green End		Braughing	N	0.185	1	0	1	0	0	0	1	0	1	0	1									1	Yes	Yes	Yes	n/a
136	3131422FP	Development in progress	N	30/09/2013	30/09/2016	90 Green End		Braughing	Y	0.034	1	0	1	0	0	0	1	0	1	0	1									1	Yes	Yes	Yes	n/a
137	3131181FP	Detained permission not started	N	23/08/2013	23/08/2016	Barn adj. The Brown Bear	The Street	Braughing	Y	0.012	1	0	1	0	0	0	1	0	1	1		1								1	Yes	Yes	Yes	n/a
138	3132086FP	Detained permission not started	N	05/02/2014	05/02/2017	Land adj. Causeway House	3 Church End	Braughing	N	0.240	1	0	1	0	0	0	1	0	1	1										1	Yes	Yes	Yes	n/a
139	31310204FP	Detained permission not started	N	26/03/2014	26/03/2017	Brickendon Grange Golf Club		Brickendon	N	0.138	2	0	2	0	0	0	2	0	2	2										2	Yes	Yes	Yes	n/a
140	3111391FP	Detained permission not started	N	12/10/2011	12/10/2014	Hedgegrove Farm	Pembridge Lane	Brickendon	Y	18.160	1	1	0	0	0	0	1	1	0	0		-1	1							0	Yes	Yes	Yes	n/a
141	31205047FO	Detained permission not started	N	23/04/2012	23/04/2015	Birch Farm	White Stubbs Lane	Brabourne	Y	0.542	2	0	2	0	0	0	2	0	2	2		2								2	Yes	Yes	Yes	n/a
142	3120732FO	Detained permission not started	N	19/06/2012	19/06/2015	Birch Farm	White Stubbs Lane	Brabourne	Y	0.000	1	0	1	0	0	0	1	0	1	1		1								1	Yes	Yes	Yes	n/a
143	3111170FP	Detained permission not started	N	12/10/2011	12/10/2014	Edgewood Farm	Brabourne Common	Brabourne	Y	2.115	1	1	0	0	0	0	1	1	0	0		-1	1							0	Yes	Yes	Yes	n/a
144	3131180RP	Development in progress	N	05/09/2013	05/09/2016	Land south of Baldock Road		Buntingford	N	0.249	3	0	3	0	0	0	3	0	3	0	3									3	Yes	Yes	Yes	n/a
145	3111153FP	Development in progress	N	17/08/2011	17/08/2014	2 High Street		Buntingford	N	0.138	3	0	3	2	0	2	1	0	1	0	1									3	Yes	Yes	Yes	n/a
146	3100815FP	Development in progress	N	09/07/2010	09/07/2013	59 High Street		Buntingford	Y	0.128	4	1	3	0	0	0	4	1	3	2	1		2							3	Yes	Yes	Yes	n/a
147	3121142FP	Development in progress	N	21/03/2013	21/03/2016	R/O 4-6 High Street		Buntingford	Y	0.083	2	0	2	0	0	0	2	0	2	0	2									2	Yes	Yes	Yes	n/a
148	31009272FP	Development in progress	N	27/07/2010	27/07/2013	St Bartholomews Church	The Causeway	Buntingford	Y	0.503	1	0	1	0	0	0	1	0	1	0	1									1	Yes	Yes	Yes	n/a
149	3121026FP	Development in progress	N	15/08/2012	15/08/2015	7-9 Hare Street Road		Buntingford	Y	0.074	3	2	1	0	2	-2	3	0	3	0	3									1	Yes	Yes	Yes	n/a
150	3120944FP	Detained permission not started	N	30/07/2012	30/07/2015	34 High Street		Buntingford	Y	0.051	4	0	4	0	0	0	4	0	4	4										4	Yes	Yes	Yes	n/a
151	3130793FP	Detained permission not started	N	23/07/2013	23/07/2016	59 High Street		Buntingford	Y	0.014	1	0	1	0	0	0	1	0	1	1		1								1	Yes	Yes	Yes	n/a

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG
	Planning Application Ref	Current Status of Permission or Site	LP Alloc	Decision Date	Lapse Date	Address	Town	PDL Area	Gain Total	Loss Total	Total number of net dwellings proposed	Gain Complete	Loss Complete	Total number of net completions to date	Gain Outstanding	Loss Outstanding	Total residual number of dwellings under construction, permitted / allocated*	Number expected to be completed in Years 1-5	2014/15 current year	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21-2024/25	2025/26-2029/30	Total Identified Supply**	Available	Suitable	Achievable	Comments		
1																																	
152	3132136FP	Detailed permission not started	N	10/04/2014	10/04/2017	Land between Sherburn and Plashes	London Road	Burlingford	N	0.084	1	0	1	0	0	0	1	0	1	1			1						1	Yes	Yes	Yes	n/a
153	3130074FP	Detailed permission not started	N	13/11/2013	13/11/2016	Land off Tilers Close		Burlingford	N	0.027	1	0	1	0	0	0	1	0	1	1		1							1	Yes	Yes	Yes	n/a
154	3140801FP	Detailed permission not started	N	31/07/2014	31/07/2017	36 High Street		Burlingford	Y	0.002	1	1	0	0	0	0	1	1	0	0		-1	1					0	Yes	Yes	Yes	n/a	
155	3060423FP	Development in progress	N	26/04/2008	26/04/2009	Dowells Farm		Colliers End	N	0.468	2	0	2	0	0	0	2	0	2	0	2							2	Yes	Yes	Yes	n/a	
156	3111131FP	Development in progress	N	17/08/2011	17/08/2014	Barcroft Farmhouse		Colliered	N	0.170	1	0	1	0	0	0	1	0	1	0	1							1	Yes	Yes	Yes	n/a	
157	3140318FP	Development in progress	N	10/04/2014	10/04/2017	Lordslip Farm		Colliered	N	0.033	1	0	1	0	0	0	1	0	1	0	1							1	Yes	Yes	Yes	n/a	
158	3120241FP	Detailed permission not started	N	27/08/2013	27/08/2016	Garage site east of 37-40 Passcroft		Colliered	Y	0.080	2	0	2	0	0	0	2	0	2	2		2						2	Yes	Yes	Yes	n/a	
159	3121486FP	Development in progress	N	09/01/2013	09/01/2016	Lordslip Farm	Green End Road	Dane End	N	0.520	2	0	2	0	0	0	2	0	2	0	2							2	Yes	Yes	Yes	n/a	
160	3060500FP	Development in progress	N	30/07/2008	30/07/2011	2 Easington Road		Dane End	Y	0.045	2	1	1	0	0	0	2	1	1	0	1							1	Yes	Yes	Yes	n/a	
161	3121030FP	Development in progress	N	06/02/2013	06/02/2016	Lowgate Farm	Lowgate End	Dane End	Y	0.180	1	2	-1	0	2	-2	1	0	1	0	1							-1	Yes	Yes	Yes	n/a	
162	3121604FP	Detailed permission not started	N	15/11/2012	15/11/2015	The Forge	Munden Road	Dane End	Y	0.036	1	0	1	0	0	0	1	0	1	1		1						1	Yes	Yes	Yes	n/a	
163	3121915RP	Detailed permission not started	N	07/01/2013	07/01/2016	1 Hawkins Hall Lane		Datchworth	Y	0.073	2	0	2	0	0	0	2	0	2	2			2					2	Yes	Yes	Yes	n/a	
164	3132008FP	Detailed permission not started	N	29/01/2014	29/01/2017	Adj. 56 Datchworth Green		Datchworth	N	0.032	2	0	2	0	0	0	2	0	2	2			2					2	Yes	Yes	Yes	n/a	
165	3120200FP	Detailed permission not started	N	23/05/2012	23/05/2015	Epping Green Farmhouse		Epping Green	Y	0.221	1	1	0	0	0	0	1	1	0	0		-1	1					0	Yes	Yes	Yes	n/a	
166	3122054FP	Detailed permission not started	N	06/02/2013	06/02/2016	Barn at East End Farm	East End	Furneux Pelham	N	0.190	1	0	1	0	0	0	1	0	1	1			1					1	Yes	Yes	Yes	n/a	
167	3111355FP	Detailed permission not started	N	27/02/2013	27/02/2016	R/O White Lion House		Furneux Pelham	N	0.090	1	0	1	0	0	0	1	0	1	1			1					1	Yes	Yes	Yes	n/a	
168	3131097FP	Development in progress	N	16/08/2013	16/08/2016	The Lodge	46 Burnt Mill Lane	Gilston	Y	0.300	1	0	1	0	0	0	1	0	1	0	1							1	Yes	Yes	Yes	n/a	
169	3032008FP	Development in progress	N	06/05/2005	06/05/2010	Marlers	Pye Corner	Gilston Park	Y	0.021	2	1	1	0	0	0	2	1	1	0	1							1	Yes	Yes	Yes	n/a	
170	3060594FP	Development in progress	N	23/03/1991	23/09/1996	Van Hages Garden Centre	Arwell Hill	Great Arwell	Y	0.008	1	0	1	0	0	0	1	0	1	0	1							1	Yes	Yes	Yes	n/a	
171	3121089FP	Detailed permission not started	N	17/08/2012	17/08/2015	R/O Home Lodge	Hillside Lane	Great Arwell	N	0.083	1	0	1	0	0	0	1	0	1	1		1						1	Yes	Yes	Yes	n/a	
172	3132202FP	Detailed permission not started	N	04/02/2014	04/02/2017	Adj. Ravenscourt	Arwell Hill	Great Arwell	N	0.120	1	0	1	0	0	0	1	0	1	1			1					1	Yes	Yes	Yes	n/a	
173	3140300FP	Detailed permission not started	N	14/04/2014	14/04/2017	37 Lower Road		Great Arwell	Y	0.181	1	0	1	0	0	0	1	0	1	1			1					1	Yes	Yes	Yes	n/a	
174	3140303FP	Detailed permission not started	N	17/04/2014	17/04/2017	Land adj. 36 Hertford Road		Great Arwell	N	0.142	1	0	1	0	0	0	1	0	1	1			1					1	Yes	Yes	Yes	n/a	
175	3122028FN	Detailed permission not started	N	24/01/2013	24/01/2016	Holly Gate	Cauthery Lane	Great Arwell	Y	0.207	1	1	0	0	0	0	1	1	0	0		-1	1					0	Yes	Yes	Yes	n/a	
176	3111387FP	Detailed permission not started	N	13/08/2012	13/08/2015	Hornhead Village Hall		Great Hornhead	Y	0.108	1	0	1	0	0	0	1	0	1	1		1						1	Yes	Yes	Yes	n/a	
177	3121913FP	Detailed permission not started	N	21/01/2014	21/01/2017	Cowley Croft Mill Farm	Mentley Lane	Great Munden	Y	0.790	1	1	0	0	0	0	1	1	0	0		-1	1					0	Yes	Yes	Yes	n/a	
178	3100282FP	Development in progress	N	14/04/2010	14/04/2013	College Farm	Halley Lane	Halley	N	0.179	4	0	4	0	0	0	4	0	4	0	4							4	Yes	Yes	Yes	n/a	
179	3131886FP	Detailed permission not started	N	17/12/2013	17/12/2016	20 Halley Lane		Halley	Y	0.120	2	1	1	0	0	0	2	1	1	1		-1	2					1	Yes	Yes	Yes	n/a	
180	3131964FP	Detailed permission not started	N	20/12/2013	20/12/2016	Haulwick Hall	The Street	Haulwick	Y	0.362	1	0	1	0	0	0	1	0	1	1			1					1	Yes	Yes	Yes	n/a	
181	3061033FP	Development in progress	N	08/08/2008	08/08/2011	87 & R/O 87-89 Railway Street		Hertford	Y	0.062	4	0	4	0	0	0	4	0	4	0	4							4	Yes	Yes	Yes	n/a	
182	3121162FP	Development in progress	N	30/08/2012	30/08/2015	R/O Parliament Square		Hertford	Y	0.037	3	0	3	0	0	0	3	0	3	0	3							3	Yes	Yes	Yes	n/a	
183	3110596RP	Development in progress	N	17/08/2011	17/08/2014	65-67 North Road		Hertford	Y	0.119	3	1	2	0	1	-1	3	0	3	0	3							2	Yes	Yes	Yes	n/a	
184	3131801FP	Development in progress	N	03/12/2013	03/12/2016	15-17 Maidenhead Street		Hertford	Y	0.025	2	0	2	0	0	0	2	0	2	0	2							2	Yes	Yes	Yes	n/a	
185	3060700FP	Development in progress	N	15/06/2006	15/06/2009	R/O 3 Cards Close		Hertford	Y	0.079	1	0	1	0	0	0	1	0	1	0	1							1	Yes	Yes	Yes	n/a	
186	3091376FP	Development in progress	N	19/11/2010	19/11/2013	Adj. 30 Mangrove Road		Hertford	N	0.042	1	0	1	0	0	0	1	0	1	0	1							1	Yes	Yes	Yes	n/a	
187	3121280RP	Development in progress	N	30/08/2012	30/08/2015	65 North Road		Hertford	Y	0.064	2	1	1	0	0	0	2	1	1	0	1							1	Yes	Yes	Yes	n/a	
188	3121425FP	Development in progress	N	16/10/2012	16/10/2015	Land at Boundary Drive	Bengoo	Hertford	N	0.080	1	0	1	0	0	0	1	0	1	0	1							1	Yes	Yes	Yes	n/a	
189	3130836FP	Development in progress	N	03/07/2013	03/07/2016	4 Ware Road		Hertford	Y	0.017	2	1	1	0	0	0	2	1	1	0	1							1	Yes	Yes	Yes	n/a	
190	3072364FP	Development in progress	N	15/01/2008	15/01/2011	89-89A Railway Street		Hertford	Y	0.022	2	2	0	0	2	-2	2	0	2	0	2							0	Yes	Yes	Yes	n/a	

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG	
	Planning Application Ref	Current Status of Permission or Site	LP Alloc	Decision Date	Lapse Date	Address		Town	POL	Area	Gain Total	Loss Total	Total number of net dwellings proposed	Gain Complete	Loss Complete	Total number of net completions to date	Gain Outstanding	Loss Outstanding	Total residual number of dwellings under construction, permitted / allocated*	Number expected to be completed in Years 1-5	2014/15 current year	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21 2024/23	2025/26 2029/30	Total Identified Supply**	Available	Suitable	Achievable	Comments	
1																																		
191	3/11/0500FP	Detained permission not started	N	26/09/2011	26/09/2014	97-101 Fore Street		Hertford	Y	0.060	4	0	4	0	0	0	4	0	4	4		4								4	Yes	Yes	Yes	n/a
192	3/13/0302FN	Detained permission not started	N	19/04/2013	19/04/2016	10 Maidenhead Street		Hertford	Y	0.010	4	0	4	0	0	0	4	0	4	4				4						4	Yes	Yes	Yes	n/a
193	3/13/0535FP	Detained permission not started	N	10/06/2013	10/06/2016	Garage site	Manor Close	Hertford	Y	0.101	4	0	4	0	0	0	4	0	4	4				4						4	Yes	Yes	Yes	n/a
194	3/13/1576FP	Detained permission not started	N	30/10/2013	30/10/2016	Land R/O 100-122 Cecil Road		Hertford	Y	0.113	4	0	4	0	0	0	4	0	4	4				4						4	Yes	Yes	Yes	n/a
195	3/13/2246FP	Detained permission not started	N	18/02/2014	18/02/2017	Car park site R/O 18-19 Hawthorn Close		Hertford	Y	0.170	4	0	4	0	0	0	4	0	4	4				4						4	Yes	Yes	Yes	n/a
196	3/12/1186FP	Detained permission not started	N	05/09/2012	05/09/2015	Former Stables, Former Green Dragon Hotel	The Wash	Hertford	Y	0.010	3	0	3	0	0	0	3	0	3	3			3						3	Yes	Yes	Yes	n/a	
197	3/13/1587FP	Detained permission not started	N	01/11/2013	01/11/2016	R/O 66-74 Cecil Road		Hertford	Y	0.080	3	0	3	0	0	0	3	0	3	3				3						3	Yes	Yes	Yes	n/a
198	3/13/1602FP	Detained permission not started	N	01/11/2013	01/11/2016	R/O 1-20 Mount Road		Hertford	Y	0.070	3	0	3	0	0	0	3	0	3	3				3						3	Yes	Yes	Yes	n/a
199	3/13/1686FP	Detained permission not started	N	13/11/2013	13/11/2016	Garage site R/O Norwood Close/Lawrence Close		Hertford	Y	0.100	3	0	3	0	0	0	3	0	3	3				3						3	Yes	Yes	Yes	n/a
200	3/13/1676FP	Detained permission not started	N	13/11/2013	13/11/2016	5-7 Parliament Square		Hertford	Y	0.015	3	0	3	0	0	0	3	0	3	3				3						3	Yes	Yes	Yes	n/a
201	3/11/1773FP	Detained permission not started	N	13/12/2011	13/12/2014	21 Domesday Street		Hertford	Y	0.033	3	1	2	0	0	0	3	1	2	2				2						2	Yes	Yes	Yes	n/a
202	3/13/1352FN	Detained permission not started	N	12/10/2012	12/10/2015	22-24 St Andrew Street		Hertford	Y	0.022	3	1	2	0	0	0	3	1	2	2				2						2	Yes	Yes	Yes	n/a
203	3/13/0362CL	Detained permission not started	N	01/05/2013	01/05/2016	106-110 Fore Street		Hertford	Y	0.039	2	0	2	0	0	0	2	0	2	2				2						2	Yes	Yes	Yes	n/a
204	3/11/1323FP	Detained permission not started	N	03/10/2011	03/10/2014	7 Market Place		Hertford	Y	0.005	1	0	1	0	0	0	1	0	1	1			1							1	Yes	Yes	Yes	n/a
205	3/12/0130FP	Detained permission not started	N	21/03/2012	21/03/2015	6 Brides Court		Hertford	Y	0.004	2	1	1	0	0	0	2	1	1	1			1							1	Yes	Yes	Yes	n/a
206	3/12/0171FP	Detained permission not started	N	27/03/2012	27/03/2015	R/O 7 Cardie Close		Hertford	N	0.061	1	0	1	0	0	0	1	0	1	1			1							1	Yes	Yes	Yes	n/a
207	3/12/1163FP	Detained permission not started	N	17/08/2012	17/08/2015	R/O 5 Cardie Close		Hertford	N	0.061	1	0	1	0	0	0	1	0	1	1			1							1	Yes	Yes	Yes	n/a
208	3/12/1400FP	Detained permission not started	N	23/10/2012	23/10/2015	Ad. 7 Hillside Terrace		Hertford	N	0.040	1	0	1	0	0	0	1	0	1	1			1							1	Yes	Yes	Yes	n/a
209	3/12/1937FP	Detained permission not started	N	10/01/2013	10/01/2016	30 Port Vale		Hertford	Y	0.006	1	0	1	0	0	0	1	0	1	1			1							1	Yes	Yes	Yes	n/a
210	3/12/1998FP	Detained permission not started	N	28/01/2013	28/01/2016	20 Admiral Street		Hertford	Y	0.018	2	1	1	0	0	0	2	1	1	1			1							1	Yes	Yes	Yes	n/a
211	3/12/1634FP	Detained permission not started	N	27/02/2013	27/02/2016	325 Ware Road		Hertford	Y	0.054	2	1	1	0	0	0	2	1	1	1			1							1	Yes	Yes	Yes	n/a
212	3/13/0900FP	Detained permission not started	N	18/06/2013	18/06/2016	3a St. Andrews Street		Hertford	Y	0.011	1	0	1	0	0	0	1	0	1	1				1						1	Yes	Yes	Yes	n/a
213	3/13/0437FP	Detained permission not started	N	24/06/2013	24/06/2016	17 Bengoe Street		Hertford	Y	0.038	1	0	1	0	0	0	1	0	1	1				1						1	Yes	Yes	Yes	n/a
214	3/13/0617FP	Detained permission not started	N	15/07/2013	15/07/2016	119 Fore Street		Hertford	Y	0.019	1	0	1	0	0	0	1	0	1	1				1						1	Yes	Yes	Yes	n/a
215	3/13/1365FP	Detained permission not started	N	17/10/2013	17/10/2016	R/O 132, 134 Bengoe Street		Hertford	N	0.025	1	0	1	0	0	0	1	0	1	1				1						1	Yes	Yes	Yes	n/a
216	3/13/1547FN	Detained permission not started	N	28/10/2013	28/10/2016	32 Mangrove Road		Hertford	Y	0.030	2	1	1	0	0	0	2	1	1	1				1						1	Yes	Yes	Yes	n/a
217	3/13/1833FP	Detained permission not started	N	10/12/2013	10/12/2016	Garages adj. 20 Punks Road		Hertford	Y	0.040	1	0	1	0	0	0	1	0	1	1				1						1	Yes	Yes	Yes	n/a
218	3/13/2061FP	Detained permission not started	N	17/01/2014	17/01/2017	The Gate House	Bluecoats Avenue	Hertford	Y	0.019	1	0	1	0	0	0	1	0	1	1				1						1	Yes	Yes	Yes	n/a
219	3/13/2201FP	Detained permission not started	N	06/03/2014	06/03/2017	2 Cromwell Road		Hertford	Y	0.008	1	0	1	0	0	0	1	0	1	1				1						1	Yes	Yes	Yes	n/a
220	3/13/1961FP	Detained permission not started	N	12/12/2013	12/12/2016	5 Great Molewood		Hertford	Y	0.168	1	1	0	0	0	0	1	1	0	0			-1	1						0	Yes	Yes	Yes	n/a
221	3/13/2060PO	Prior Approval	N	19/12/2013	30/05/2016	Stonemasons House	75 Railway Street	Hertford	Y	0.030	2	0	2	0	0	0	2	0	2	2			2							2	Yes	Yes	Yes	n/a
222	3/13/1617FP	Development in progress	N	30/10/2013	30/10/2016	43 London Road		Hertford Heath	Y	0.041	2	1	1	0	0	0	2	1	1	0	1								1	Yes	Yes	Yes	n/a	
223	3/11/1341FP	Detained permission not started	N	22/11/2011	22/11/2014	Highwood	Mount Pleasant	Hertford Heath	Y	0.008	1	0	1	0	0	0	1	0	1	1			1							1	Yes	Yes	Yes	n/a

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG
	Planning Application Ref	Current Status of Permission or Site	LP Alloc	Decision Date	Lapse Date	Address	Town	POL	Area	Gain Total	Loss Total	Total number of net dwellings proposed	Gain Complete	Loss Complete	Total number of net completions to date	Gain Outstanding	Loss Outstanding	Total residual number of dwellings under construction, permitted/ allocated*	Number expected to be completed in Years 1-5	2014/15 current year	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21 - 2024/25	2025/26 - 2029/30	Total Identified Supply**	Available	Suitable	Achievable	Comments	
1																																	
224	312/1482FP	Detained permission not started	N	21/11/2012	21/11/2015	Hallebury And Is College	College Road	Hertford Heath	Y	0.006	1	0	1	0	0	0	1	0	1	1		1							1	Yes	Yes	Yes	n/a
225	313/0933FP	Detained permission not started	N	02/08/2013	02/08/2016	57 Trinity Road		Hertford Heath	N	0.023	1	0	1	0	0	0	1	0	1	1			1						1	Yes	Yes	Yes	n/a
226	313/0862FP	Detained permission not started	N	05/08/2013	05/08/2016	Land adj. 1 Barclay Close		Hertford Heath	N	0.016	1	0	1	0	0	0	1	0	1	1			1						1	Yes	Yes	Yes	n/a
227	313/2245FP	Detained permission not started	N	12/02/2014	12/02/2017	69 Mount Pleasant		Hertford Heath	N	0.112	1	0	1	0	0	0	1	0	1	1				1					1	Yes	Yes	Yes	n/a
228	313/0509FP	Development in progress	N	13/06/2013	13/06/2016	279-280 Hertingfordbury Road		Hertingfordbury	Y	0.100	3	0	3	1	0	1	2	0	2	0	2								3	Yes	Yes	Yes	n/a
229	310/1804FP	Development in progress	N	17/08/2011	17/08/2014	232 Hertingfordbury Road		Hertingfordbury	Y	0.240	1	1	0	0	1	-1	1	0	1	0	1								0	Yes	Yes	Yes	n/a
230	312/1765FP	Detained permission not started	N	05/12/2012	05/12/2015	Hertingfordbury Park House	St Marus Lane	Hertingfordbury	Y	0.520	2	1	1	0	0	0	2	1	1	1	1		1						1	Yes	Yes	Yes	n/a
231	310/1386FN	Detained permission not started	N	04/10/2010	04/10/2013	Actons Farm	Actons Lane	High Wych	N	0.299	1	0	1	0	0	0	1	0	1	1		1							1	Yes	Yes	Yes	n/a
232	311/1687FP	Detained permission not started	N	16/11/2011	16/11/2014	The Bungalow	High Wych Road	High Wych	Y	0.160	1	1	0	0	0	0	1	1	0	0		-1	1						0	Yes	Yes	Yes	n/a
233	313/1863FP	Detained permission not started	N	08/11/2013	08/11/2016	Howe Green Hall		Howe Green	Y	0.600	1	1	0	0	0	0	1	1	0	0		-1	1						0	Yes	Yes	Yes	n/a
234	314/0589FP	Detained permission not started	N	22/05/2014	22/05/2017	The Rectory	High Wych Road	High Wych	Y	0.348	1	1	0	0	0	0	1	1	0	0		-1	1						0	Yes	Yes	Yes	n/a
235	309/1094FP	Development in progress	N	27/07/2009	27/07/2009	1 & 2 Halfway House Cottages	Stanstead Road	Hurston	Y	0.149	2	2	0	1	2	-1	1	0	1	0	1								0	Yes	Yes	Yes	n/a
236	313/0522FP	Detained permission not started	N	06/11/2013	06/11/2016	Adj. 2 Wilford Road		Hurston	N	0.026	1	0	1	0	0	0	1	0	1	1			1						1	Yes	Yes	Yes	n/a
237	313/0514FP	Detained permission not started	N	18/06/2013	18/06/2016	29 Woolmers Lane		Letty Green	Y	0.295	1	1	0	0	0	0	1	1	0	0		-1	1						0	Yes	Yes	Yes	n/a
238	313/1741FP	Detained permission not started	N	10/12/2013	10/12/2016	Garage site R/O 16-18 Gosdards Close		Little Berkhamsstead	Y	0.090	2	0	2	0	0	0	2	0	2	2		2							2	Yes	Yes	Yes	n/a
239	308/1295FP	Development in progress	N	10/09/2008	10/09/2011	Former Estate Office	Albury Hall	Little Hadham & Church End	Y	0.287	2	0	2	0	0	0	2	0	2	0	2								2	Yes	Yes	Yes	n/a
240	312/0387FP	Detained permission not started	N	16/01/2013	16/01/2016	Florence Cottage	The Ford	Little Hadham	Y	0.350	1	1	0	0	0	0	1	1	0	0		-1	1						0	Yes	Yes	Yes	n/a
241	313/2007FP	Detained permission not started	N	12/03/2014	12/03/2017	Brontley Farm	Brontley Lane	Much Hadham	N	0.806	2	0	2	0	0	0	2	0	2	2			2						2	Yes	Yes	Yes	n/a
242	313/0381FP	Detained permission not started	N	31/05/2013	31/05/2016	The Old Crown	Tower Hill	Much Hadham	Y	0.115	1	0	1	0	0	0	1	0	1	1			1						1	Yes	Yes	Yes	n/a
243	313/1931FP	Detained permission not started	N	31/12/2013	31/12/2016	Carlisle Court	Brontley Lane	Much Hadham	N	0.010	1	0	1	0	0	0	1	0	1	1			1						1	Yes	Yes	Yes	n/a
244	313/1891FP	Detained permission not started	N	05/02/2014	05/02/2017	Land adj. Newlons	Church Lane	Much Hadham	N	0.340	1	0	1	0	0	0	1	0	1	1			1						1	Yes	Yes	Yes	n/a
245	313/0792FP	Detained permission not started	N	05/08/2013	05/08/2016	Ridgemont	Wulford Road	Much Hadham	Y	0.040	1	1	0	0	0	0	1	1	0	0		-1	1						0	Yes	Yes	Yes	n/a
246	313/1233FP	Detained permission not started	N	04/09/2013	04/09/2016	Old Hall	St Edmunds College	Old Hall Green	Y	0.021	2	0	2	0	0	0	2	0	2	2			2						2	Yes	Yes	Yes	n/a
247	313/0840FP	Detained permission not started	N	23/07/2013	23/07/2016	1 & 2 Farm Lane		Old Hall Green	Y	0.113	4	2	2	0	0	0	4	2	2	2			2						2	Yes	Yes	Yes	n/a
248	313/0423FP	Detained permission not started	N	17/06/2013	17/06/2016	The Chapel, Puckeridge Congregational Church	High Street	Puckeridge	Y	0.065	1	0	1	0	0	0	1	0	1	1			1						1	Yes	Yes	Yes	n/a
249	313/1197FP	Detained permission not started	N	30/09/2013	30/09/2016	Land R/O 26 High Street	High Street	Puckeridge	Y	0.020	1	0	1	0	0	0	1	0	1	1			1						1	Yes	Yes	Yes	n/a
250	311/0205FP	Development in progress	N	18/04/2011	18/04/2014	Cambridge Road Garage	122 Cambridge Road	Sawbridgeworth	Y	0.084	4	0	4	0	0	0	4	0	4	0	4								4	Yes	Yes	Yes	n/a
251	307/1408FP	Development in progress	N	03/09/2007	03/09/2010	Adj. 61 Springhall Road		Sawbridgeworth	Y	0.087	1	0	1	0	0	0	1	0	1	0	1								1	Yes	Yes	Yes	n/a
252	311/1075FP	Development in progress	N	10/08/2011	10/08/2014	Adj. 70 Elmwood		Sawbridgeworth	N	0.015	1	0	1	0	0	0	1	0	1	0	1								1	Yes	Yes	Yes	n/a
253	312/1543FP	Development in progress	N	22/11/2012	22/11/2015	Adj. 94 Station Road		Sawbridgeworth	N	0.024	1	0	1	0	0	0	1	0	1	0	1								1	Yes	Yes	Yes	n/a
254	307/2601FP	Development in progress	N	18/01/2008	18/01/2011	61 Springhall Road		Sawbridgeworth	Y	0.033	1	1	0	0	1	-1	1	0	1	0	1								0	Yes	Yes	Yes	n/a
255	313/0545FP	Development in progress	N	10/06/2013	10/06/2016	80 Pilsbury Drive		Sawbridgeworth	Y	0.196	1	1	0	0	1	-1	1	0	1	0	1								0	Yes	Yes	Yes	n/a
256	313/1327FP	Development in progress	N	18/09/2013	18/09/2016	24 Forebury Avenue		Sawbridgeworth	Y	0.047	1	1	0	0	1	-1	1	0	1	0	1								0	Yes	Yes	Yes	n/a
257	313/1808FP	Detained permission not started	N	06/12/2013	06/12/2016	Land adj. 16 Station Road		Sawbridgeworth	Y	0.020	2	0	2	0	0	0	2	0	2	2			2						2	Yes	Yes	Yes	n/a
258	313/1111FP	Detained permission not started	N	29/08/2013	29/08/2016	21 Knight Street		Sawbridgeworth	Y	0.089	2	1	1	0	1	-1	2	0	2	2			2						1	Yes	Yes	Yes	n/a
259	312/1287FP	Detained permission not started	N	25/08/2012	25/09/2015	Valerines	3 Bakers Walk	Sawbridgeworth	Y	0.007	1	0	1	0	0	0	1	0	1	1		1							1	Yes	Yes	Yes	n/a

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG
	Planning Application Ref	Current Status of Permission or Site	LP Alloc	Decision Date	Lapse Date	Address		Town	POL	Area	Gain Total	Loss Total	Total number of net dwellings proposed	Gain Complete	Loss Complete	Total number of net completions to date	Gain Outstanding	Loss Outstanding	Total residual number of dwellings under construction, permitted / allocated*	Number expected to be completed in Years 1-5	2014/15 current year	2019/16	2016/17	2017/18	2018/19	2019/20	2020/21-2024/25	2025/26-2029/30	Total Identified Supply**	Available	Suitable	Achievable	Comments
1																																	
260	313/0836FP	Detained permission not started	N	16/07/2013	16/07/2016	Land adj. 3 London Road		Sawbridgeworth	N	0.089	1	0	1	0	0	0	1	0	1	1			1						1	Yes	Yes	Yes	n/a
261	313/1562FP	Detained permission not started	N	31/10/2013	31/10/2016	R/O 17 Bell Street		Sawbridgeworth	Y	0.004	1	0	1	0	0	0	1	0	1	1			1						1	Yes	Yes	Yes	n/a
262	313/1647FP	Detained permission not started	N	06/12/2013	06/12/2016	Sawbridgeworth Police Station	Cambridge Road	Sawbridgeworth	Y	0.036	1	0	1	0	0	0	1	0	1	1			1						1	Yes	Yes	Yes	n/a
263	313/2183FP	Detained permission not started	N	06/03/2014	06/03/2017	13 Rowney Wood		Sawbridgeworth	Y	0.066	2	1	1	0	0	0	2	1	1	1			1						1	Yes	Yes	Yes	n/a
264	313/2200FP	Detained permission not started	N	03/03/2014	03/03/2017	Pishobury House	Pishobury Drive	Sawbridgeworth	Y	0.014	1	0	1	0	0	0	1	0	1	1			1						1	Yes	Yes	Yes	n/a
265	314/0791FP	Detained permission not started	N	01/07/2014	01/07/2017	The Good Intent	16 Station Road	Sawbridgeworth	Y	0.014	2	1	1	0	0	0	2	1	1	1			1						1	Yes	Yes	Yes	n/a
266	313/1587PO	Prior Approval	N	08/10/2013	30/09/2016	Bell Street Studios	Bell Street	Sawbridgeworth	Y	0.026	1	0	1	0	0	0	1	0	1	1			1						1	Yes	Yes	Yes	n/a
267	312/1130FP	Development in progress	N	09/07/2013	09/07/2016	Former Bus Vehicles Old Site, London Road		Spellbrook	Y	0.230	1	0	1	0	0	0	1	0	1	0	1								1	Yes	Yes	Yes	n/a
268	312/1345FP	Detained permission not started	N	03/10/2012	03/10/2015	R/O 20 High Street		Standon	N	0.038	1	0	1	0	0	0	1	0	1	1			1						1	Yes	Yes	Yes	n/a
269	313/1631FP	Detained permission not started	N	08/01/2014	08/01/2017	Land adj. 42 Chatterholts		Stapleford	Y	0.070	2	0	2	0	0	0	2	0	2	2			2						2	Yes	Yes	Yes	n/a
270	313/1851RP	Detained permission not started	N	16/12/2013	16/12/2016	Former Cock Inn Public House	Girns Road	Stocking Pelham	Y	0.270	3	0	3	0	0	0	3	0	3	3			1	2					3	Yes	Yes	Yes	n/a
271	313/0780FO	Development in progress	N	03/07/2013	03/07/2016	41 & 41A Upper Green Road		Tewin	Y	0.232	3	1	2	0	0	0	3	1	2	3	-1		3						2	Yes	Yes	Yes	n/a
272	313/0421FP	Development in progress	N	02/07/2013	02/07/2016	R/O 2 Herford Road		Tewin	N	0.120	2	0	2	0	0	0	2	0	2	2			2						2	Yes	Yes	Yes	n/a
273	313/0696FP	Development in progress	N	20/06/2013	20/06/2016	Land adj. Rose And Crown	Upper Green Road	Tewin	Y	0.080	1	0	1	0	0	0	1	0	1	0	1								1	Yes	Yes	Yes	n/a
274	313/0500FP	Development in progress	N	11/06/2013	11/06/2016	41A Upper Green Road		Tewin	Y	0.090	1	0	1	0	0	0	1	0	1	1			1						1	Yes	Yes	Yes	n/a
275	313/1228FP	Detained permission not started	N	04/09/2013	04/09/2016	Adj. 74 Upper Green Road		Tewin	N	0.190	1	0	1	0	0	0	1	0	1	1				1					1	Yes	Yes	Yes	n/a
276	313/1917FP	Detained permission not started	N	12/12/2013	12/12/2016	Adj. 48 Upper Green		Tewin	N	0.090	1	0	1	0	0	0	1	0	1	1				1					1	Yes	Yes	Yes	n/a
277	313/0951FP	Detained permission not started	N	22/05/2014	22/05/2017	Land adj. 30 Lower Green		Tewin	N	0.046	1	0	1	0	0	0	1	0	1	1				1					1	Yes	Yes	Yes	n/a
278	313/0594FN	Development in progress	N	04/07/2013	04/07/2016	Robins	Tewin Close	Tewin Wood	Y	0.166	1	1	0	0	0	0	1	1	0	0	1								0	Yes	Yes	Yes	n/a
279	313/1105FO	Development in progress	N	16/08/2013	16/08/2016	2 Bashes Road		Tewin Wood	Y	0.200	1	1	0	0	1	-1	1	0	1	0	1								0	Yes	Yes	Yes	n/a
280	313/2226FP	Detained permission not started	N	25/02/2014	25/02/2017	35 Firs Walk		Tewin Wood	Y	0.120	1	1	0	0	0	0	1	1	0	0			-1	1					0	Yes	Yes	Yes	n/a
281	313/0285FN	Detained permission not started	N	12/04/2013	12/04/2016	Broadfield Hall	Broadfield	Throcking	Y	1.001	1	1	0	0	0	0	1	1	0	0			-1	1					0	Yes	Yes	Yes	n/a
282	310/1889FP	Detained permission not started	N	10/03/2011	10/03/2014	Suncrest		Throcking	Y	0.189	1	1	0	0	0	0	1	1	0	0			-1	1					0	Yes	Yes	Yes	n/a
283	313/0942FP	Development in progress	N	18/07/2013	18/07/2016	Long Barn, Home Farm	Youngsbury	Wadesmill	N	0.120	3	0	3	0	0	0	3	0	3	3			3						3	Yes	Yes	Yes	n/a
284	313/1037FP	Development in progress	N	16/08/2013	16/08/2016	62 High Street		Waltham	Y	0.325	3	0	3	0	0	0	3	0	3	0	3								3	Yes	Yes	Yes	n/a
285	314/0155FP	Detained permission not started	N	31/03/2014	31/03/2017	99 High Street		Waltham	Y	0.102	2	0	2	0	0	0	2	0	2	2				2					2	Yes	Yes	Yes	n/a
286	313/1555FP	Detained permission not started	N	29/10/2013	29/10/2016	Land adj. 29 Moors Ley		Waltham	N	0.026	1	0	1	0	0	0	1	0	1	1				1					1	Yes	Yes	Yes	n/a
287	3106/0110FP	Development in progress	N	04/05/2006	04/05/2009	22 Baldock Street		Ware	Y	0.036	4	0	4	3	0	3	1	0	1	0	1								4	Yes	Yes	Yes	n/a
288	314/0524FP	Development in progress	N	20/05/2014	20/05/2017	The Green	Kings Hill	Ware	N	0.218	4	0	4	0	0	0	4	0	4	0	4								4	Yes	Yes	Yes	n/a
289	313/0786FP	Development in progress	N	11/07/2013	11/07/2016	37 Star Street		Ware	Y	0.021	4	0	4	0	0	0	4	0	4	0	4								4	Yes	Yes	Yes	n/a
290	312/0195FP	Development in progress	N	23/03/2012	23/03/2015	16 Baldock Street		Ware	Y	0.008	2	1	1	0	0	0	2	1	1	0	1								1	Yes	Yes	Yes	n/a
291	312/0855FP	Development in progress	N	19/07/2012	19/07/2015	3 Amwell End		Ware	Y	0.008	2	1	1	0	0	0	2	1	1	0	1								1	Yes	Yes	Yes	n/a
292	313/1064FP	Detained permission not started	N	22/08/2013	22/08/2016	Garage site R/O 21-33 Parrel Road		Ware	Y	0.150	4	0	4	0	0	0	4	0	4	4			4						4	Yes	Yes	Yes	n/a
293	313/1701FP	Detained permission not started	N	18/11/2013	18/11/2016	Gospel Hall	Collett Road	Ware	Y	0.034	4	0	4	0	0	0	4	0	4	4			4						4	Yes	Yes	Yes	n/a
294	3106/0205FP	Detained permission not started	N	18/09/2013	18/09/2016	77 High Street		Ware	Y	0.021	3	0	3	0	0	0	3	0	3	3				3					3	Yes	Yes	Yes	n/a
295	313/1634FP	Detained permission not started	N	08/11/2013	08/11/2016	Land R/O The Octagon	Collett Road	Ware	Y	0.071	3	0	3	0	0	0	3	0	3	3				3					3	Yes	Yes	Yes	n/a
296	312/1144FP	Detained permission not started	N	30/08/2012	30/08/2015	Fox Talbot House	2 Amwell End	Ware	Y	0.040	2	0	2	0	0	0	2	0	2	2			2						2	Yes	Yes	Yes	n/a
297	313/1098FP	Detained permission not started	N	21/08/2013	21/08/2016	Garage site R/O 4-6 Parrel Road		Ware	Y	0.100	2	0	2	0	0	0	2	0	2	2			2						2	Yes	Yes	Yes	n/a

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG																												
	Planning Application Ref	Current Status of Permission or Site	LP Alloc	Decision Date	Lapse Date	Address		Town	PDL	Area	Gain Total	Loss Total	Total number of net dwellings proposed	Gain Complete	Loss Complete	Total number of net completions to date	Gain Outstanding	Loss Outstanding	Total residual number of dwellings under construction, permitted/ allocated*	Number expected to be completed in Years 1-5	2014/15 current year	2016/16	2016/17	2017/18	2018/19	2019/20	2020/21-2024/25	2025/26-2029/30	Total identified supply**	Available	Suitable	Achievable	Comments																												
1																																																													
298	313/1469FP	Detained permission not started	N	08/11/2013	08/11/2016	Land adj. 80 Berkeley Close		Ware	Y	0.028	2	0	2	0	0	0	2	0	2	2		2								2	Yes	Yes	Yes	n/a																											
299	313/1154FP	Detained permission not started	N	20/08/2013	20/08/2016	23 High Street		Ware	Y	0.020	2	0	2	0	0	0	2	0	2	2			2							2	Yes	Yes	Yes	n/a																											
300	313/1452FP	Detained permission not started	N	15/10/2013	15/10/2016	Garage site R/O 9-13 Tower Road		Ware	Y	0.053	2	0	2	0	0	0	2	0	2	2		2								2	Yes	Yes	Yes	n/a																											
301	311/0092FN	Detained permission not started	N	13/07/2011	13/07/2014	31A & 33 Anwell End		Ware	Y	0.023	5	4	1	0	0	0	5	4	1	1		1								1	Yes	Yes	Yes	n/a																											
302	312/1194FP	Detained permission not started	N	07/08/2012	07/08/2015	48 Heath Drive		Ware	Y	0.040	2	1	1	0	0	0	2	1	1	1		1								1	Yes	Yes	Yes	n/a																											
303	312/1826FP	Detained permission not started	N	07/01/2013	07/01/2016	Land at Deerfield Close		Ware	N	0.030	1	0	1	0	0	0	1	0	1	1		1								1	Yes	Yes	Yes	n/a																											
304	313/0331FP	Detained permission not started	N	21/05/2013	21/05/2016	89 Masley Hill		Ware	Y	0.045	1	0	1	0	0	0	1	0	1	1			1							1	Yes	Yes	Yes	n/a																											
305	313/1214FP	Detained permission not started	N	20/09/2013	20/09/2016	The Annexe	27 The Bourne	Ware	Y	0.032	1	0	1	0	0	0	1	0	1	1		1								1	Yes	Yes	Yes	n/a																											
306	313/2022FP	Detained permission not started	N	09/01/2014	09/01/2017	1st floor, 7 Frenche Yard	Anwell End	Ware	Y	0.012	1	0	1	0	0	0	1	0	1	1			1							1	Yes	Yes	Yes	n/a																											
307	311/0332FP	Detained permission not started	N	20/04/2011	20/04/2014	56 Hoe Lane		Ware	Y	0.136	1	1	0	0	0	0	1	1	0	0		-1	1							0	Yes	Yes	Yes	n/a																											
308	313/1471FP	Detained permission not started	N	08/10/2013	08/10/2016	Garages & hardstanding	Kingham Road	Ware	Y	0.116	3	0	3	0	0	0	3	0	3	3		3								3	Yes	Yes	Yes	n/a																											
309	313/1488FP	Detained permission not started	N	07/10/2013	07/10/2016	Adj. 2 Appleton Avenue		Ware	Y	0.075	2	0	2	0	0	0	2	0	2	2		2								2	Yes	Yes	Yes	n/a																											
310	312/1140FP	Detained permission not started	N	12/09/2012	12/09/2015	Adj. 99 High Street		Walton-at-Stone	N	0.100	1	0	1	0	0	0	1	0	1	1		1								1	Yes	Yes	Yes	n/a																											
311	313/0503FP	Detained permission not started	N	28/10/2013	28/10/2016	Adj. 37 Station Road		Walton-at-Stone	N	0.036	1	0	1	0	0	0	1	0	1	1			1							1	Yes	Yes	Yes	n/a																											
312	313/0242FP	Detained permission not started	N	31/01/2014	31/01/2017	Kirk & Dicky		Welford Green	Y	0.128	2	1	1	0	0	0	2	1	1	1			1							1	Yes	Yes	Yes	n/a																											
313	313/0026FP	Development in progress	N	12/03/2013	12/03/2016	The Red Lodge	Pipp Green	Westland Green	Y	0.197	1	1	0	0	1	-1	1	0	1	0	1									0	Yes	Yes	Yes	n/a																											
314	310/0447FP	Detained permission not started	N	05/05/2010	05/05/2013	Knights Hill Farm		Westmill	N	0.982	4	0	4	0	0	0	4	0	4	4		4								4	Yes	Yes	Yes	n/a																											
315	312/2020FP	Detained permission not started	N	24/01/2013	24/01/2016	Westmill Bury		Westmill	N	0.180	1	0	1	0	0	0	1	0	1	1		1								1	Yes	Yes	Yes	n/a																											
316	312/0115FP	Detained permission not started	N	15/03/2012	15/03/2015	9 Bell Lane		Widford	Y	0.100	2	1	1	0	0	0	2	1	1	1		1								1	Yes	Yes	Yes	n/a																											
317	314/0400FP	Detained permission not started	N	02/05/2014	02/05/2017	Pear Tree Field Wood		Wyddial	Y	0.910	1	0	1	0	0	0	1	0	1	1			1							1	Yes	Yes	Yes	n/a																											
318																																																													
319	Losses																																																												
320	313/1745FP	Detained permission not started	N	25/11/2013	25/11/2016	42-48 Rye Street		Bishop's Stortford	Y	0.050	2	4	-2	0	0	0	2	4	-2	0	-2									-2	Yes	Yes	Yes	n/a																											
321	313/0037FP	Detained permission not started	N	26/03/2013	26/03/2016	2-4 Rhodes Avenue		Bishop's Stortford	Y	0.030	2	3	-1	0	0	0	2	3	-1	0	-1									-1	Yes	Yes	Yes	n/a																											
322	313/2190CL	Detained permission not started	N	30/01/2014	30/01/2017	34A & 34b Tamworth Road		Hertford	Y	0.038	1	2	-1	0	0	0	1	2	-1	0	-1									-1	Yes	Yes	Yes	n/a																											
323																																																													
324	Residual allocated sites (Currently allocated and sites submitted LDF/DLP)																																																												
325		Long Term or Safeguarded Site	Y			Land To North	ASR 5	Bishop's Stortford	N		400	0	400	0	0	0	400	0	400	195					65	65	65	205		400	Yes	Yes	Yes	Expected to come forward within 5 year period																											
326		Allocated site	Y			Goods Yard	London Road	Bishop's Stortford		4.546	200	0	200	0	0	0	200	0	200	134						67	67	66	200	Yes	Yes	Yes	Expected to come forward within 5 year period																												
327		Allocated site	Y			Hadham Road		Bishop's Stortford		4.482	250	0	250	0	0	0	250	0	250	187					62	62	63	63	250	No	Yes	No	Expected to come forward within 5 year period																												
328		Allocated site	Y			Mill Site	Dane Street/Station Road	Bishop's Stortford		0.840	100	0	100	0	0	0	100	0	100	0										0	No	Yes	No	Not expected to come forward for development in next 15 years. Removed from land supply calculation																											
329		Allocated site	Y			Apton Road Car Park		Bishop's Stortford		0.244	16	0	16	0	0	0	16	0	16	0										0	No	Yes	No	Not expected to come forward for development within next 15 years. Removed from land supply calculation																											
330		Allocated site	Y			Land at Cambridge Road	Criffers	Sawbridgeworth		2.512	80	0	80	0	0	0	80	0	80	0									80	80	No	Yes	No	Not expected to come forward for development in next 5 years. Removed from land supply calculation																											
331		Allocated site	Y			101-103 New Road		Ware		0.116	6	0	6	0	0	0	6	0	6	6					6				6	Yes	Yes	Yes	Expected to come forward within 5 year period																												

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG	
	Planning Application Ref	Current Status of Permission or Site	LP Alloc	Decision Date	Lapse Date	Address		Town	PDL	Area	Gain Total	Loss Total	Total number of net dwellings proposed	Gain Complete	Loss Complete	Total number of net completions to date	Gain Outstanding	Loss Outstanding	Total residual number of dwellings under construction, permitted/ allocated*	Number expected to be completed in Years 1-5	2014/15 current year	2019/16	2019/17	2019/18	2019/20	2020/21-2024/25	2025/26-2029/30	Total Identified Supply**	Available	Suitable	Achievable	Comments		
1																																		
332																																		
333																																		
334	Site where principle of development accepted (planning permissions subject to S106, allocated sites in preferred options, development brief accepted)																																	
335	313/0075/0P	Outline permission subject to S106	Y			Land To North		ASRs 1-4 (including SCA)			2200	0	2200	0	0	0	2200	0	2200	850			100	250	250	250	1250	100	2200	Yes	Yes	Yes	Expected to come forward within 5 year period	
336	313/1375/0P	Full permission subject to S106 agreement	N			Land north of Park Farm Industrial Estate		Ermine Street		Buntingford	N		180	0	180	0	0	0	180	0	180				60	60	60		180	Yes	Yes	Yes	Expected to come forward within 5 year period	
337	313/1820/FP	Full permission subject to S106 agreement	N			Land adj. Sacombe Road		Sacombe Road		Waterford	Y		8	0	8	0	0	0	8	0	8			8					8	Yes	Yes	Yes	Expected to come forward within 5 year period	
338																																		
339	Contingent sites (strategic sites described in RSS, other sites not included above but identified in SLAA/Urban capacity study e.g. broad locations for growth)																																	
340		SLAA Site				Works		Southmill Road		Bishop's Stortford	Y		35	0	35	0	0	0	35	0	35						35		35	Yes	Yes	Yes	Expected to come forward within 6-10 years. Not included in land supply calculation.	
341		SLAA Site				Oxford House		London Road		Bishop's Stortford	Y		6	0	6	0	0	0	6	0	6						6		6	No	Yes	Yes	Expected to come forward within 6-10 years. Not included in land supply calculation.	
342		SLAA Site				Bishop's Stortford Delivery Office & Post Office		South Street		Bishop's Stortford	Y		25	0	25	0	0	0	25	0	25						25		25	No	Yes	Yes	Expected to come forward within 6-10 years. Not included in land supply calculation.	
343		SLAA Site				Former Fyle Wilson Site		Station Road		Bishop's Stortford	Y		42	0	42	0	0	0	42	0	42						42		42	Yes	Yes	Yes	Expected to come forward within 6-10 years. Not included in land supply calculation.	
344		SLAA Site				110-114 South Street		South Street		Bishop's Stortford	Y		24	0	24	0	0	0	24	0	24					24			24	Yes	Yes	Yes	Expected to come forward within 6-10 years. Not included in land supply calculation.	
345		SLAA Site				Sports Field associated with Birchwood High School		Pansorpe Lane		Bishop's Stortford	N		40	0	40	0	0	0	40	0	40						40		40	No	Yes	Yes	Expected to come forward within 6-10 years. Not included in land supply calculation.	
346		SLAA Site				Sainsbury Depot		Buntingford		Y		316	0	316	0	0	0	316	0	316	268			41	69	69	69	68		316	Yes	Yes	Yes	Expected to come forward within 5 year period
347		SLAA Site				National Grid Site/Norbury Woodway		Mead Lane		Hertford	Y		200	0	200	0	0	0	200	0	200						200		200	Yes	Yes	Yes	Expected to come forward within 6-10 years. Not included in land supply calculation.	
348		SLAA Site				Hertford Fire Station & Fire Service HQ		Old London Road		Hertford	Y		40	0	40	0	0	0	40	0	40							40	40	No	Yes	Yes	Expected to come forward within 11-15 years. Not included in land supply calculation.	
349		SLAA Site				West Street Aliments		West Street		Hertford	N		10	0	10	0	0	0	10	0	10							10	10	No	Yes	Yes	Expected to come forward within 11-15 years. Not included in land supply calculation.	
350		SLAA Site				30-34 and 33-41 Chambers Street		Chambers Street		Hertford	Y		18	0	18	0	0	0	18	0	18						18		18	No	Yes	Yes	Expected to come forward within 6-10 years. Not included in land supply calculation.	
351		SLAA Site				Land at Brainers Field		Hertford		N		18	0	18	0	0	0	18	0	18	18					18			18	Yes	Yes	Yes	Expected to come forward within 5 year period	
352		SLAA Site				Hertford Delivery Office		Greencroftes		Hertford	Y		18	0	18	0	0	0	18	0	18						18		18	No	Yes	Yes	Expected to come forward within 6-10 years. Not included in land supply calculation.	
353		SLAA Site				Former Waters Garage		North Road		Hertford	Y		14	0	14	0	0	0	14	0	14				14				14	Yes	Yes	Yes	Expected to come forward within 5 year period	
354		SLAA Site				Elbert Wurlings		Hale Road		Hertford	Y		10	0	10	0	0	0	10	0	10					10				10	Yes	Yes	Yes	Expected to come forward within 5 year period
355		SLAA Site				Land to the rear of 4 Newsports		Newsports		Swadbyeworth	N		5	0	5	0	0	0	5	0	5						5		5	No	Yes	Yes	Expected to come forward within 6-10 years. Not included in land supply calculation.	
356		SLAA Site				Rear of 39 High Street		High Street		Ware	Y		6	0	6	0	0	0	6	0	6			6				6	No	Yes	Yes	Expected to come forward within 5 year period		
357		SLAA Site				Land adjacent to 2 and R/O 2-10 The Roundings		Hertford Heath		N		2	0	2	0	0	0	2	0	2	2				2				2	Yes	Yes	Yes	Expected to come forward within 5 year period	
358		SLAA Site				Land at Walnut Close		Walnut Close		Much Hadham	N		3	0	3	0	0	0	3	0	3				3				3	Yes	Yes	Yes	Expected to come forward within 5 year period	
359		SLAA Site				Tollsworth Way/Caravan Site		Tollsworth Way		Puckeridge	Y		12	0	12	0	0	0	12	0	12					12			12	Yes	Yes	Yes	Expected to come forward within 5 year period	
360		SLAA Site				The Wilderness (land between Hoddesdon Road & the New River)		Hoddesdon Road		Stanstead Abbots & St Margarets	N		5	0	5	0	0	0	5	0	5						5		5	Yes	Yes	Yes	Expected to come forward within 6-10 years. Not included in land supply calculation.	
361		SLAA Site				The Spinney		Hoddesdon Road		Stanstead Abbots & St Margarets	Y		12	0	12	0	0	0	12	0	12					12			12	No	Yes	Yes	Expected to come forward within 6-10 years. Not included in land supply calculation.	
362		SLAA Site				Land north of North Drive		North Drive		High Cross	N		20	0	20	0	0	0	20	0	20						20		20	Yes	Yes	Yes	Expected to come forward within 6-10 years. Not included in land supply calculation.	
363		SLAA Site				Land south of The Rectory		North Drive		High Cross	N		25	0	25	0	0	0	25	0	25						25		25	No	Yes	Yes	Expected to come forward within 6-10 years. Not included in land supply calculation.	
364		SLAA Site				Land at 'The Bungalow'		North Drive		High Cross	Y/N		10	0	10	0	0	0	10	0	10					10			10	Yes	Yes	Yes	Expected to come forward within 5 year period	
365		SLAA Site				Land to the rear of 'The Bungalow'		North Drive		High Cross	N		47	0	47	0	0	0	47	0	47			30	17				47	Yes	Yes	Yes	Expected to come forward within 5 year period	

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG
	Planning Application Ref	Current Status of Permission or Site	LP Alloc	Decision Date	Lapse Date	Address		Town	PDL	Area	Gain Total	Loss Total	Total number of net dwellings proposed	Gain Complete	Loss Complete	Total number of net completions to date	Gain Outstanding	Loss Outstanding	Total residual number of dwellings under construction, permitted/ allocated*	Number expected to be completed in Years 1-5	2014/15 current year	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21 - 2024/25	2025/26 - 2029/30	Total Identified Supply**	Available	Suitable	Achievable	Comments
1																																	
366		SLAA Site				Watton-at-Stone Depot		Watton-at-Stone	Y		20	0	20	0	0	0	20	0	20	20					20				20	Yes	Yes	Yes	Expected to come forward within 5 year period
367		SLAA Site				Land at 22 Great Innings North		Watton-at-Stone	Y		4	0	4	0	0	0	4	0	4	4				4					4	Yes	Yes	Yes	Expected to come forward within 5 year period
368																																	
369		Windfall Allowance																															
370		at 5 y Windfall Allowance																		270		0	0	90	90	90							
371		at Allowance Years 6-15																									410	360					
372																																	
373																																	
374		Totals											6994	193	25	168	6506	80	6516	3789	591	604	690	897	895	713	2521	590	6508				

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 8 DECEMBER 2014 EXECUTIVE – 6 JANUARY 2015

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;
- It includes the latest set of recommendations from Peter Brett Associates, relating to the approach to financial viability, and the wide-ranging implications of this in terms of many aspects of the emerging District Plan;
- It also sets out delays with critical pieces of evidence, and the implications of this for the overall timeline for the District Plan.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE</u> <u>PANEL AND EXECUTIVE: That:</u>	
(A)	the District Plan Delivery Study Update Note from PBA, together with the presentation on Financial Viability, and the Progress Update, contained at Essential Reference Papers 'B', 'C', and 'D' respectively, including the implications of those for many aspects of the District Plan work, including the timeline, be noted.
<u>RECOMMENDATIONS FOR COUNCIL: That:</u>	
(A)	the District Plan Delivery Study Update Note from PBA, together with the presentation on Financial Viability, and the Progress Update, contained at Essential Reference Papers 'B', 'C', and 'D' respectively, including the implications of those for many aspects of the District Plan work, including the timeline, be noted.

1.0 Background

- 1.1 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. The specification for the study was published in summer 2014 (see Background Papers).
- 1.2 Peter Brett Associates (PBA) has been appointed to undertake the study on behalf of the Council. An initial Update from PBA, which included initial recommendations on transport and the calculation of Objectively Assessed Housing Needs, was previously reported to the Panel (see Background Papers).
- 1.3 Written outputs from the Delivery Study will be posted on the Council's website (see Background Papers).
- 1.4 The Council continues to work closely with ATLAS in relation to the strategic scale sites proposed in the District Plan, to ensure that the approach to testing of the preferred options meets the necessary levels of rigour and transparency.

2.0 Report

- 2.1 In order to assist Members in understanding the significant implications of PBA's emerging advice, John Baker, Partner at PBA, visited the Council on 7 November to discuss a wide range of deliverability issues at the Member Policy Working Group. The presentation from this session is contained at **Essential Reference Paper 'B'**. PBA also produced a more detailed Update Note relating to whole-plan viability, infrastructure delivery, and policy trade-offs, which is contained at **Essential Reference Paper 'C'**.
- 2.2 The main messages from these documents may be summarised as follows:
 - Some policies have significant cost implications, and it may not always be possible to achieve all of the policy aspirations because they may not be financially viable;
 - Affordable Housing in particular, is a significant cost and, depending on infrastructure and other costs associated with a scheme, it may be necessary to significantly reduce the level of affordable housing sought in some instances;

- The Government is proposing to use the building regulations, rather than planning policy, to achieve construction and energy standards, and this may require significant revisions to some of the Council's draft policies;
- Financial viability assessment is a specialist field, but there is an important role for Members in terms of helping to decide on local priorities, in instances where a trade-off between policy aspirations is required;
- The Council's infrastructure planning function should be recognised and strengthened, both in terms of internal and external arrangements.

Progress Update

- 2.3 An update on progress with the Delivery Study is contained at **Essential Reference Paper 'D'**, as at 19 November 2014. This update shows progress against the eight tasks of the Delivery Study as set out in the original specification.
- 2.4 From the update note it will be clear that a number of meetings with the promoters of strategic sites have been held. Any submissions from these meetings, including presentations and meeting notes, will be posted to the Council's website (see Background Papers). It should be noted that any material posted to the website is part of an ongoing assessment process, and site promoters' plans are likely to change over time, both in response to challenges from the Council and due to their own planning and evidence-gathering processes.
- 2.5 As part of work on the Delivery Study, the Council has also sought to engage with local issues through the East Herts Association of Parish and Town Councils, and also through the Bishop's Stortford Neighbourhood Plan group.

Timeline

- 2.6 Considerable progress has been made, but it is clear that there are a number of reasons why it has not yet been possible to conclude the study, including delays with the four-authority Strategic Housing Market Assessment, receiving meaningful viability inputs from some strategic site promoters, the need to resolve some outstanding infrastructure issues (including for example the Bishop's Stortford Secondary Schools aspirations), and satisfactory resolution of the approach to management of the cumulative impacts of development on transport infrastructure.

- 2.7 This has implications for the overall timeline for the next iteration of the District Plan, because this evidence and the issues arising are critical to resolve satisfactorily prior to another public consultation, in order to ensure that the plan is found sound at Examination in Public.
- 2.8 The Council fully recognises the implications of any delay for the planned delivery of development across the District. Working together with PBA and ATLAS, the Council will investigate any reasonable means by which the overall process can be expedited in order to bring forward the District Plan as soon as possible without jeopardising the prospects for planned development accompanied by the necessary supporting infrastructure.
- 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

- Submissions from the site promoters, including meeting notes are on the Council's website at:
www.eastherts.gov.uk/preferredoptions2014
- Outputs from the Delivery Study to date are posted to the Council's website at: www.eastherts.gov.uk/deliverystudy
- Delivery Study Update Report 17 July (contains the Specification)
- Delivery Study Update Report 22 October (contains the first Update Note from PBA).

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

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Report Author: Martin Paine - Senior Planning Policy Officer
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IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):	<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>
Consultation:	None
Legal:	None
Financial:	None
Human Resource:	None immediately beyond that already identified. However, the PBA Update does recommend that a lead officer should be nominated with responsibility for infrastructure planning.
Risk Management:	Failure to satisfactorily address the issues outlined in the report could lead to the plan being found undeliverable and therefore unsound.
Health and wellbeing – issues and impacts:	The link between planning and health has been long established. The built and natural environments are major determinants of health and wellbeing.

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East Herts District Plan Delivery Study Members' Workshop 7 November 2014



Peter Brett Associates LLP



talking about

- deliverable plans
- viability
- funding infrastructure
- CIL and s106
- integrated plans
- evidence and telling the story

Peter Brett Associates LLP



“plans should be deliverable”

NPPF para 173

Peter Brett Associates LLP



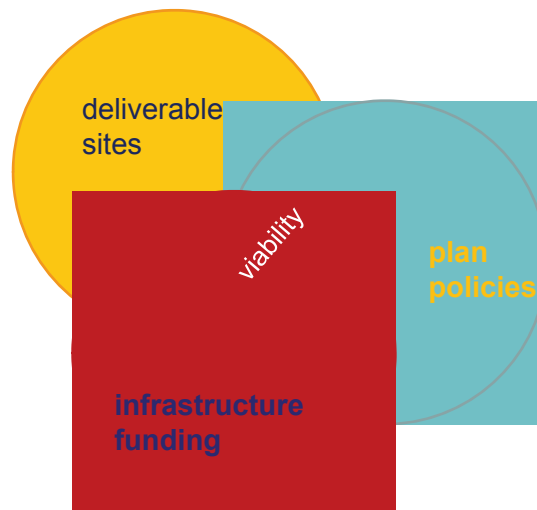
a deliverable plan

- a supply of development to meet objectively addressed housing requirements
- identified, integrated and funded infrastructure
- policies that are effective in achieving the plan’s objectives without inhibiting the required development

Peter Brett Associates LLP



viability evidence is the critical link



Peter Brett Associates LLP



Defining viability

‘An individual development can be said to be viable if, after taking account of all costs, including central and local government policy and regulatory costs, and the cost and availability of development finance, the scheme provides a competitive return to the developer to ensure that development takes place, and generates a land value sufficient to persuade the land owner to sell the land for the development proposed.’ Harman

Peter Brett Associates LLP



sites

A supply of housing for the plan period

- **Deliverable** sites over years 0-5 (viable, suitable location, available)
- **Developable** sites over years 6-10 + onwards if possible (suitable location, 'reasonable prospect for viable development at the point envisaged')

Supply for the next five years is a critical test

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Housing trajectory – 0- 5yrs and beyond

	A	B	C	D	E	F	G
1			2011-2016	2016-2021	2021-2026	2026-2031	2011-2031
2	Other	Winstall allowance	0	450	400	350	1200
3	Other	Completions	1,082	0	0	0	1082
4	Other	Commitments	1,572	0	0	0	1572
5	Other	Group 1 Villages	0	250	125	125	500
6	SLAA	Bishop's Stortford Urban Area	0	75	172	0	247
7	Allocation	Bishop's Stortford Goods Yard	0	0	200	0	200
8	Allocation	Widham Road Secondary School Reserve Site, Bishop's Stortford (increase to 250 in 2016-2021 if secondary school not required)	0	0	0	0	0
9	Allocation	North of Bishop's Stortford (reduce to 2,350 if secondary school required)	0	1300	800	500	2600
10	Allocation	South of Bishop's Stortford (reduce to 750 if secondary school required)	0	500	500	0	1000
11	Allocation	East of Bishop's Stortford	0	150	0	0	150
12	SLAA	Buntingford Urban Area	0	13	0	0	13
13	Allocation	Buntingford South (former Depot)	0	300	0	0	300
14	Allocation	Buntingford North	0	0	150	0	150
15	SLAA	Hertford Urban Area	0	365	36	50	451
16	Allocation	North of Hertford	0	0	150	0	150
17	Allocation	South of Hertford	0	50	0	0	50
18	Allocation	West of Hertford	0	550	0	0	550
19	SLAA	Sawbridgeworth Urban Area	0	0	5	0	5
20	Allocation	West of Sawbridgeworth	0	400	0	0	400
21	SLAA	Ware Urban Area	0	20	12	0	32
22	Broad Location	Gteton Area	0	0	1,250	1,750	3000
23	Broad Location	North and East of Ware	0	0	800	1,000	1800
24	Broad Location	East of Welwyn Garden City	0	0	0	450	450
25		TOTAL SUPPLY, including contingency of c.8%	2654	4421	4630	4225	15932
26		Projected Need (750 dwellings per year)	3750	3750	3750	3750	15000
27		Shortfall spread over 2016-2031		3329	3120	3525	10984
28		Need plus shortfall		4115	4115	4115	
29		8% buffer moved forward from 2021-2031 to 2016-2021		208	-103	-103	
30		Total Requirement	2654	4321	4012	4012	15000

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Policies

three categories

- Policies which do not have an effect on development costs
- Policies likely to increase the cost of certain types of development in all or some areas
- Policies setting specific requirements for something to be delivered as part of a strategic allocation - with a cost

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policies

Anticipated plan policy area (reference and page)	Does the policy have a cost implication?	Do these policies apply to all development or specific forms of development and when will it be imposed?	What is the estimate cost implication in monetary terms of the policy?	How should these costs been dealt with in this study – workshop discussion
SP1	No			
SP2	Yes	All development within Town Centre and out of town retail areas	IDP?	
SP3	Yes	Environmental enhancements Improvements to green links and spaces	IDP?	
CP1	No			
CP3 – i	Yes	Links with out of town retail	IDP?	
Currently SP6 Anker Valley	Yes	Infrastructure costs associated with delivery of housing site	IDP	
Housing Allocations (not yet finalized)	Yes	Infrastructure costs associated with delivery of housing site	IDP	
CP4	Yes	Affordable Housing – applies to all housing development		
CP5	Yes	Housing Types		

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Infrastructure funding – component from development

s106

development specific such as

- access arrangements
- training agreements
- affordable housing

negotiable charge

may be provided on site as part of development of strategic sites

CIL

generalised infrastructure provision – such as

- public transport services
- green infrastructure
- education provision
- strategic road links
- flood mitigation
- health and social services
- emergency services

mandatory fixed charge

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CIL

- potentially greater efficiency in collecting funding from development
- CIL charging Schedule requires local plan to be in place
- delivery of infrastructure for development requires careful design of respective roles of CIL and s106
- overall pot fixed by viability, but CIL charges fixed whilst s106 is negotiable
- proportion of CIL goes to neighbourhood forum - and from funding of infrastructure needed for development?
- CIL requires a funding gap - what makes up the gap?

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s106

- Planning obligations (s106 payments) remain
- Local authority to say what CIL is for (Reg 123 list) – cannot seek s106 for anything on this list
- s106 – three statutory tests
 - Necessary
 - Directly related to development
 - Fairly and reasonably related in scale and kind
- Five or more rule
- S106 scaled back with CIL in place

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Achieving a balance with CIL charges

£



CIL
charge
per sq
metre

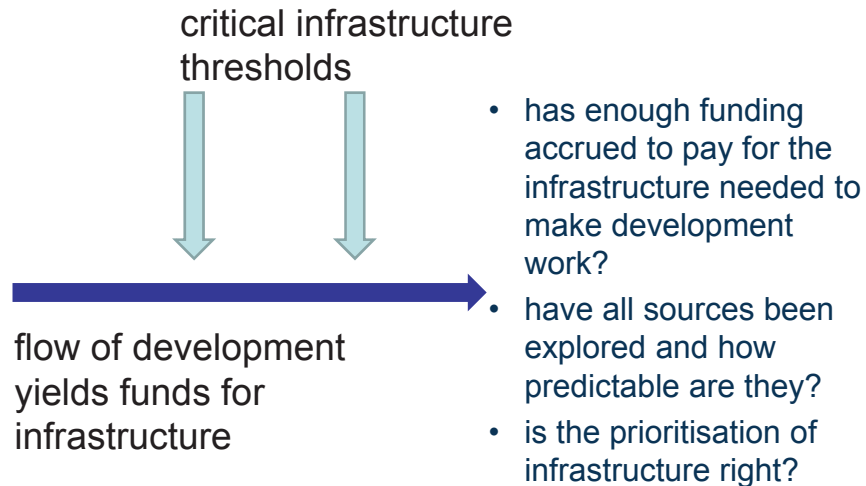
too high risks
inhibiting development

too low misses the
opportunity to collect money
to fund infrastructure

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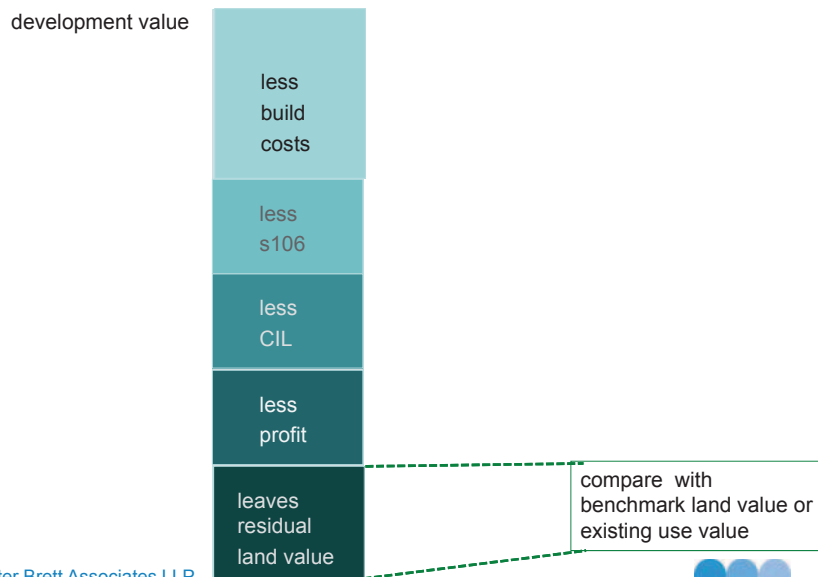
development and infrastructure trajectories



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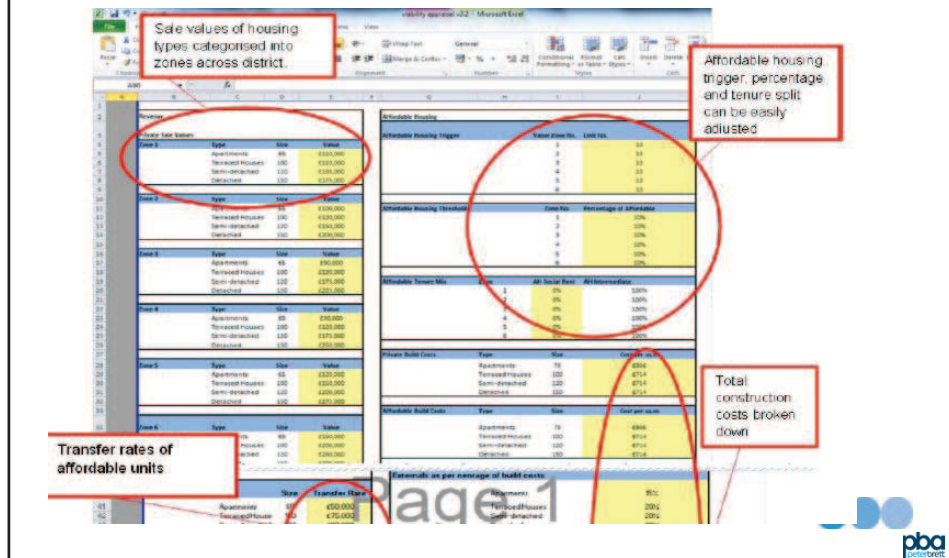
how a development appraisal works



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Appraisal model allows different policy costs to be explored, amongst other variables



outputs

an integrated set of recommendations

- on CIL Charging Schedule, with development types and locations
- on affordable housing policies, with thresholds, proportions and market areas
- on the respective roles of s106 and CIL
- on changes to draft policies, to achieve objectives with less inhibiting effects

The story of a deliverable plan

High cost policy aspirations have to be traded with funding of infrastructure to make sites and places work and with deliverability of supply to meet the housing requirement

A compelling link between what is in the plan and the evidence, clearly and concisely presented

Peter Brett Associates LLP



Closing the gaps

John Baker
Partner



NOTES

ESSENTIAL REFERENCE PAPER 'C'

Job Name: East Herts Delivery Study
Job No: 31122
Date: 24 November
Prepared By: Shilpa Rasaiah and John Baker
Subject: East Herts Delivery Study Update - whole plan viability, infrastructure delivery and policy-trade-offs

1.1 Introduction

1.1.1 Work is underway by Peter Brett Associates advising East Herts District Council on the deliverability of the East Herts District Plan which is currently at a draft stage. This note provides some background on the approach to the study, and a commentary on some of the issues encountered in undertaking the work. It would be fair to say that the issues in East Herts are complex, with, for example, significant cross-boundary issues given the pattern of settlements in the wider area relative to administrative boundaries, and a considerable range of possible locations being considered as part of the supply of development land, including some very big potential sites. We are engaging with the promoters of some of the most significant potential development sites. Whilst this is vital, we are encountering different levels of familiarity amongst promoters with the plan making process as it has evolved in recent years, and with the importance of an evidence based demonstration of deliverability.

1.2 National planning policy framework and whole plan viability

1.2.1 The National Planning Policy Framework (NPPF) recognises that the 'developer funding pot' from viable development schemes is finite. Decisions on how money is obtained from development and used have to take account of the differing demands of local plan policy requirements, such as the provision of affordable housing, as well as the delivery of infrastructure needed to make development work and implement the overall area strategy. This will be a critical issue in developing, testing and implementing the East Herts District Plan.

1.2.2 The National Planning Policy Framework (the Framework), advises that cumulative effects of policy should not render plans unviable:

'Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that

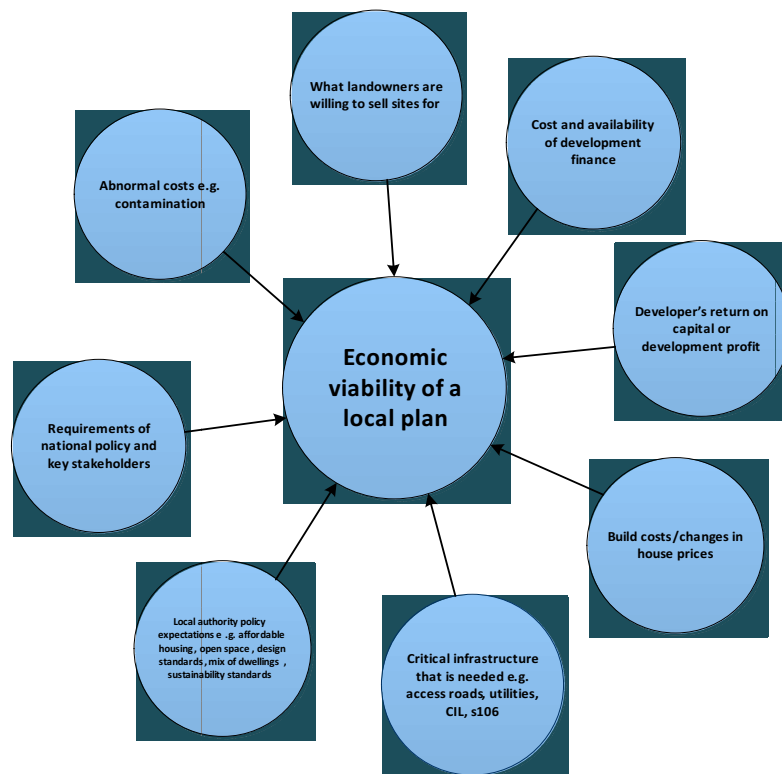
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their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable'.¹

- 1.2.3 The central objective of whole plan viability approach is to ensure that the overall development aspirations of the strategy for the plan area should not be put at serious risk when the local planning authority has taken account of the cumulative burden of policy costs such as affordable housing provision, space standards, green infrastructure, flood mitigation measures, and design standards, as well as the funds needed to meet infrastructure requirements. The tests for demonstrating the deliverability of the first five years housing supply are particularly stringent.
- 1.2.4 The guidance contained in the 'Viability Testing Local Plan Report - an advice note for Planning practitioners' prepared by the Local Housing Delivery Group, and chaired by Sir John Harman in June 2012 (the Harman Report) provides the basis of our approach to the whole plan viability assessment (WPV) of the East Herts District Plan. Figure 1 below from the Harman report illustrates the range of viability input considerations including the various policies and standards that need to be taken account of in the WPV assessment.

¹ DCLG (2012) National Planning Policy Framework (41, para 173)

Figure 1: Inputs informing whole plan viability assessment



Source: Viability Testing Local Plans – Advice for Planning Practitioners – June 2012

- 1.2.5 We are working with EHDC officers to identify which of the emerging District Plan policies would be likely to impose costs on development – particularly residential development – and how significant these costs might be in relation to the viability of development. This process may lead to suggestions for changes to policies when these are considered within the overall balance to be struck between plan deliverability, infrastructure provision and policy aspirations.
- 1.2.6 Viability assessments, whether undertaken by the Council or by developers, are very sensitive to the costs imposed on development by some types of policies. Requirements for developments to provide particular infrastructure and perform to specified standards need to be set out as District Plan policies so they have appropriate weight, and need to be clearly expressed. Such policies cannot be left to some form of SPD. SPDs can only explain and expand on local plan policy, but cannot set policy.
- 1.2.7 From our discussions with the strategic site promoters, none are currently proposing to provide any on-site community based energy generation, as this is not seen as a practical or viable approach by developers. Policy CC3 Renewable and Low Carbon Energy is an example of a policy in the draft District Plan that might need reconsideration therefore, with the Council

NOTES

looking at whether its objective might be achieved by other more practicable and cost effective means, taking account of technological developments.

- 1.2.8 The Government has recently consulted on the Housing Standards Review. The aim is to simplify requirements and channel these through national Building Regulation requirements in a standardised form. There is often the potential for duplication of nationally set standards in local policy in relation to low carbon and energy efficiency measures, and now potentially with water efficiency measures. Our advice to authorities generally is not to go beyond building regulation standards in local plan policies, as these tend to have disproportionate cost implications, and are in any case very difficult to justify. For this assessment we have taken the view that where a policy is likely to be taken forward as part of the Housing Standards Review, then it should be left to building regulations which has a strong monitoring mechanism incorporated.

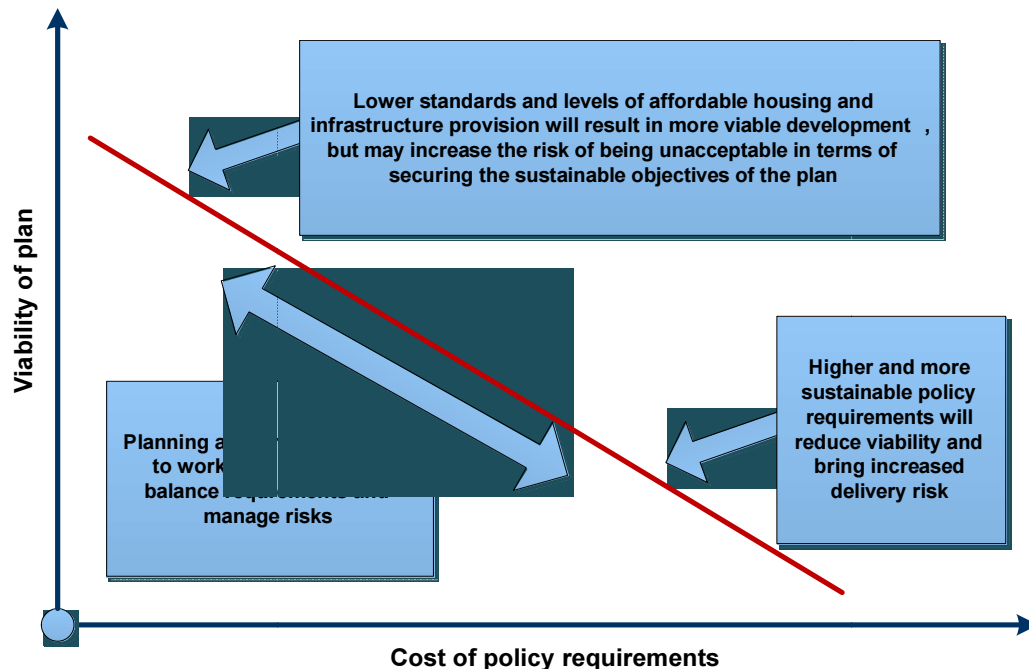
Difficult policy trade-offs are likely to be needed especially between achieving affordable housing and other local policy demands.

- 1.2.9 The Harman Report recognises, that except for the highest value areas, it is unlikely that all policy aspirations will be met from developer funding and important policy choices will need to be made. This challenge is also highlighted in the Framework at para. 54:

‘The challenge for planning authorities is to balance this (sustainable development) with the realities of economic viability and develop plans that can deliver sustainable development – that is, to balance aspirational objectives with realistic and deliverable policies’.

- 1.2.10 The East Herts elected members will need to make important decisions about the local plan policies, based on the right balance for their area. In particular, choices are likely to be required between meeting affordable housing needs and funding for infrastructure, because these are the highest cost items.
- 1.2.11 The WPV assessment is to help inform the decisions made by elected members when preparing and adopting a Local Plan. The Harman Report uses the illustration in figure 1.3, included below, to demonstrate the important trade-offs between delivering viable development and securing policy requirements.

Figure 2: Balancing delivery risk and sustainable plan policies



Source: Viability Testing Local Plans – Advice for Planning Practitioners – June 2012

1.2.12 Within the WPV work we will make recommendations to help guide officers and members on policy requirements that would have significant cost implications, and also on those that might duplicate national requirements, and seek to show how the Council's objectives can be best pursued within the overall balance to be struck with infrastructure funding within a demonstrably deliverable plan.

1.3 Distinction between plan-wide and site-specific viability

1.3.1 The Harman Report distinguishes viability at two levels as follows:

- *'An individual development can be said to be viable if, after taking account of all costs, including central and local government policy and regulatory costs, and the cost and availability of development finance, the scheme provides a competitive return to the developer to ensure that development takes place, and generates a land value sufficient to persuade the land owner to sell the land for the development proposed.'*
- At a Local Plan level, viability is very closely linked to the concept of deliverability. In the case of housing, a Local Plan can be said to be deliverable if sufficient sites are viable (as defined in the previous paragraph) to deliver the plan's housing requirement over the plan period.

NOTES

- 1.3.2 It is important to note the approach to local plan viability assessment does not require all sites in the plan to be viable. The Harman Report says that a site typologies approach to understanding plan viability is sensible. Indeed the report also acknowledges that a *'plan-wide test will only ever provide evidence of policies being 'broadly viable.'* This is what an Inspector examining the East Herts District Plan would expect to see. The report continues: *'the assumptions that need to be made in order to carry out a test at plan level mean that any specific development site may still present a range of challenges that render it unviable given the policies in the Local Plan, even if those policies have passed the viability test at the plan level'*. This is one reason why our advice advocates a 'viability cushion' in setting developer contribution rates to manage these risks.
- 1.3.3 As part of the WPV work, we hosted a developer workshop on 9 October to seek views on a range of development viability assumptions to inform the testing of the 'generic' sites. The discussion with representatives of the development industry active in the area provided greater familiarity with market conditions and will reduce the scope for later challenges to the assumptions used in the viability assessments. A note of the meeting has been prepared, and feedback received at the workshop and subsequently as written responses will be considered and account will be taken of these inputs in helping to refine the assumption inputs.
- 1.3.4 In the case of East Hertfordshire, there is also a need to distinguish between 'strategic sites' which are the proposed major allocations or identified 'broad locations' at East of Welwyn, Gilston, and Ware, South of Bishop's Stortford, and at the Bishop's Stortford Good's Yard. The strategic sites will all have a need for substantial on site infrastructure requirements to meet their development needs. These will have costs in the form of site enabling or opening up costs to bring a site to a readily developable state, and also in terms of site specific infrastructure requirements such as transport measure, education, social and health facilities, and open space, sports and leisure provision. The cumulative impact of the development of these sites will have to be considered too, with for instance the likely need for investment in measures to address the consequences of substantial new development combined with the growth in travel demand generated from existing development.
- 1.3.5 The approach to viability assessment and how developers will be required to contribute towards the cost of infrastructure needs arising from specific development site has to be carefully considered as there is now the possibility of a variety of approaches, using either CIL or s106 alone, or the two together in some combination.
- 1.3.6 We have agreed with the officer group on which sites are to be treated as 'strategic sites for the viability appraisals. We have also sought views at the developer workshop on the site typologies to be tested for the WPV assessment and amended the mix to reflect the feedback received. It is

NOTES

important to note that some variation of the viability considerations will inevitably arise in negotiation at site specific level when and if these sites become the subject of planning applications.

1.4 Guidance on infrastructure planning and delivery

1.4.1 The Framework states the following with regard to infrastructure planning:

- Plan making should include strategic policies, not only for *'the homes and jobs needed in the area'* but for *'the provision of infrastructure'* (para. 156), and that Local Plans should crucially *'plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies'* of the Framework (para. 157)
- It is *'important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion ... For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan'* (para. 177).

1.4.2 The proposed development will require the provision of a range of infrastructure that is emerging through the preparation of the Infrastructure Delivery Plan. To ensure the timely delivery of infrastructure, there will be a requirement to proactively plan, prioritise and manage the delivery of infrastructure.

1.4.3 This process for managing the delivery of infrastructure starts at the policy preparation stage. There are a number of policies which refer to the need for developer contributions to provide infrastructure. Having reviewed the various policies that relate to infrastructure planning, we consider there is scope to simplify and strengthen the infrastructure delivery policy by doing the following:

- Merging the two separate overarching policies that relate to infrastructure into one single Infrastructure Delivery and Developer Contributions Policy
- Removing any reference to securing developer contributions from individual policies and cross referencing these to the single overarching policy
- Supporting this overarching policy with a 'live' infrastructure delivery plan, kept under review annually and reflecting the changes taking place in infrastructure requirements and priorities, as well as completions
- Establishing an internal arrangement to help support the delivery of infrastructure such as nominating a lead officer with responsibility for infrastructure planning
- Establishing a joint 'Infrastructure Delivery Group' made up of key service providers such as the transport and education authorities, utilities

NOTES

companies, the emergency services, and the health authorities, together with developers, to inform infrastructure requirements, to consider priorities for spending, and to explore opportunities to bid for new funding sources and innovative means to secure investment. Given the strong cross boundary impact of the growth on neighbouring authorities, and vice versa, as well as the remit of the participants, this group may be established over an area greater than East Herts district.

Delivery Study – Progress Update

Task	Progress as of 19 November 2014
1: Review of Transport Evidence and Requirements	<p>PBA meetings schedule:</p> <ul style="list-style-type: none"> • Initial transport workshop with adjoining Local Planning Authorities, Highways Agency, and Hertfordshire County Council (9 September) • Hertfordshire County Council (10 October, 24 November) • East Herts Association of Parish and Town Councils (6 November) • Bishop's Stortford Neighbourhood Plan Group (13 November) • M11 Junction 8 assessment/modelling (27 August, 13 November) • VISUM Modelling results (26 November) • Cumulative impacts workshop with promoters of the strategic sites, Hertfordshire County Council, and ATLAS (2 December) • Site-specific meetings as per task 6 below <p>Scope of the work has been extended to include a transport 'think piece' (extended essay) to take a high level view of the evidence and provide a commentary on the main issues, together with recommendations.</p> <p>Submissions from the East Herts Association of Parish and Town Councils and Bishop's Stortford Neighbourhood Plan group, to inform the 'think piece'.</p>
2: Review of site specific concept masterplanning	Complete – will be used to inform Task 6.
3: Infrastructure Delivery Plan	Draft chapters underway, jointly in preparation with Officers and are to be circulated to relevant providers for input and comment
4: Local Plan Policies	<p>PBA update note dated 24 November contains guidance on policies (Essential Reference Paper C). Policies matrix in preparation – awaiting outcome of viability exercise (see Presentation in Essential Reference Paper B). Presentation/discussion with Member Working Group on 7 November.</p>

Task	Progress as of 19 November 2014
5: Plan-wide Viability	Workshop for all site promoters held on 9 October, setting out PBA assumptions and seeking views. Consultation on assumptions closed and feedback received. Viability modelling ready to proceed on the same timeline as Task 6.
6: Location-specific Viability	Location-specific meetings held on 8 October with Lafarge Tarmac (East of Welwyn Garden City), Countryside Properties (South of Bishop's Stortford), jointly with Leach Homes and Ptarmigan Land (North and East of Ware), jointly with Places for People and CPP (Gilston Area) on 3 November. Meeting notes and presentations where available have been posted to the website at www.eastherts.gov.uk/preferredoptions2014 . Initial request for viability inputs from strategic site promoters issued, however it has taken longer than anticipated to receive back the required information. An Excel template and further guidance was issued to the relevant promoters and inputs are expected by 24 November. Site-specific modelling will commence following receipt of this information.
7: Community Infrastructure Levy and Section 106/Section 278 costs	This work is dependent on tasks 5 and 6 in order to understand what the site-specific approach should be and whether CIL would be appropriate in each case.
8: Review of Objectively Assessed Development Needs	PBA update on overall approach to the buffer issue and approach to spreading the shortfall reported to District Planning Executive Panel on 22 October. Remainder of Task 8 is dependent on finalisation of the 4-authority Strategic Housing Market Assessment (SHMA), which has been delayed pending further work and is not anticipated to report until January.

EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 8 DECEMBER 2014 EXECUTIVE – 6 JANUARY 2015

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 Member-level meeting with Harlow Council
- 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.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE</u> <u>PANEL AND EXECUTIVE: That:</u>	
(A)	the notes of the Member-level meeting held with Harlow Council be noted; and
(B)	the Terms of Reference for the Member Board of the 'Co-Operation for Sustainable Development Group' of authorities be noted.
<u>RECOMMENDATIONS FOR COUNCIL: That:</u>	
(A)	the notes of the Member-level meeting held with Harlow Council be agreed; and
(B)	the Terms of Reference for the Member Board of 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 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

2.0 Report

- 2.1 Subsequent to the Duty to Co-Operate meetings detailed above, a further meeting has subsequently taken place with Harlow Council. The notes of this meeting are attached at **Essential Reference Paper 'B'**. Harlow 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 An Officer group was previously established as a first step towards establishing formalised arrangements for the Co-Op Group. The Officer group Terms of Reference were presented to District Planning Executive Panel on 22nd October 2014.
- 2.6 Further to this, an initial meeting of the Member Board of the Co-Op Group was held on 20th October 2014. Once agreed, the minutes of this meeting will be presented to District Planning Executive Panel. The Terms of Reference for this group, as agreed by the constituent local authorities, are contained within **Essential Reference Paper 'C'**.
- 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

- Duty to Co-Operate Update Report (District Planning Executive Panel, 22nd October 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>

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: Chris Butcher - Senior Planning Policy Officer
chris.butcher@eastherts.gov.uk

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:	Ongoing in accordance with the Duty to Co-operate
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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East Herts District Council – Harlow District Council Meeting Notes

Date/time: Thursday 2 October 2014, 5:30pm

Venue: Harlow District Council Offices

Attendees:

East Herts District Council

Cllr Mike Carver (MC) Executive Member for Strategic Planning and Transport

Claire Sime, Team Leader, Planning Policy

Martin Paine, Senior Planning Officer

Harlow District Council

Cllr Jon Clempner, Leader of the Council

Cllr Tony Durcan, Deputy Leader

Graeme Bloomer, Head of Regeneration

Dianne Cooper, Planning and Building Control Manager

Paul McBride, Planning Policy Manager

Meeting Notes:

1. The importance of getting a robust plan in place was discussed. East Herts was very concerned by the current unplanned development proposals allowed on appeal in the Rural Area Beyond the Green Belt and wanted to bring forward a Plan as quickly as reasonably possible in order to manage planning applications more effectively.
2. At the same time, East Herts was mindful of the importance of getting robust infrastructure plans in place to support development. Complications with infrastructure planning were delaying progress and this was very frustrating for many in the Council and beyond.
3. East Herts explained that it had appointed Peter Brett Associates to undertake a Delivery Study to look at the deliverability of the draft Plan, including proposals for the Gilston Area. The specification for this work was in the public domain. This work covered a number of technical areas, including financial viability, transport advice, and infrastructure planning. Harlow Officers had been involved in a number of East Herts workshops on delivery matters.
4. Harlow Council's response to the East Herts draft District Plan consultation (dated 22 May 2014) was reviewed. Three main points were discussed in relation to this. Each is addressed in turn.

Objectively Assessed Housing Needs

5. Harlow Council's consultation response states that *"The Draft District Plan does not provide sufficient reasoning for why only housing needs arising from forecast population changes are being met and why an*

upward adjustment to these figures has not been made to reflect other considerations (such as affordability pressures across the EHDC area) and the need to drive forward long term national growth as set out in government policy”

6. In relation to this point, it was discussed that the projections are the starting point for consideration, as set out in the NPPF. The new Strategic Housing Market Assessment (SHMA) was due to be published in draft shortly and this should provide fresh evidence as to the levels of housing, and enable refinement of the evidence in the demographic projections. The SHMA would also address issues of market signals and affordability.
7. However, it was understood that the SHMA itself would not provide a single definitive answer as to an appropriate housing requirement, and the evidence would require careful interpretation. East Herts was taking advice from Peter Brett Associates, authors of the Planning Advisory Service Technical Note on Objectively Assessed Needs in relation to interpretation of the SHMA. It was discussed that the figure of 750 represents a step change in supply over the RSS figure of 600 per annum.

Unmet needs of adjoining authorities

8. The second main point in Harlow Council's consultation response states that *“The Plan does not recognise or seek to accommodate the development needs of adjoining Councils, including Harlow. Moreover, neither the Draft Plan nor any supporting evidence to date, demonstrates how EHDC has satisfied the legal and soundness components of the Duty to Co-Operate.”*
9. It was agreed that the Planning Inspectorate is taking a hard line on this issue, as evidenced in the conclusions of a number of Local Plans elsewhere in the country where examinations had been suspended pending resolution of these issues.
10. East Herts Council acknowledges this issue. However, only when the SHMA evidence was available and the level of Objectively Assessed Needs was understood, that it would be possible to consider this issue properly. It would also be necessary to understand deliverability and phasing issues in the area before a considered view could be reached on whether/how much could be identified towards unmet needs, should any be identified. ATLAS had provided evidence of delivery rates at strategic developments elsewhere in the country which should be used to inform thinking around this point.
11. The Duty to Co-Operate had formed an important factor in East Herts Council's decision to include the Gilston Area within the draft Plan. Careful consideration had been given to Harlow Council's regeneration aspirations through achieving critical mass, and the technical work

demonstrating this level of consideration was available on East Herts Council's website.

12. A Memorandum of Understanding (MoU) was discussed. East Herts was attempting to secure MoUs with all seven adjoining Local Planning Authorities. These needed to be agreed by the Council's membership. East Herts was currently in discussion with Welwyn Hatfield Borough Council over an MoU covering the area east of Welwyn Garden City. Although, given the comparatively early stage in the plan preparation process, this could not currently resolve issues such as unmet need, it was nevertheless a step forward in identifying further areas for joint working. It was agreed that Harlow and East Herts should consider a similar approach.
13. Harlow Council acknowledged that it had not been possible to arrange Member-level meetings recently due to Harlow Council's elections in May 2014 and the subsequent time taken to appoint to Cabinet positions. It was discussed that there was good joint-working at Officer level, including work on joint studies. Harlow Council had been participating in various workshops arranged by East Herts, including on the Delivery Study.

Level of Certainty

14. The final main point in Harlow Council's consultation response states that *"The Draft Plan commits only to further testing of the appropriateness of the Gilston Area for development through a separate development plan document. The final scale and nature of development here (if any) is a central issue for the strategy that has wider implications for not only providing for EHDCs development needs but also for adjoining District Council areas. This matter should not be deferred until a later date but considered fully as part of the Draft Plan."*
15. East Herts Council acknowledged that there remains at present a significant degree of uncertainty around the Gilston Area, and that this would need to be addressed in order for the Plan to move forward and satisfy the Planning Inspectorate at examination.
16. One area of uncertainty included the different visions of development provided by Places for People and City and Provincial Properties, with some fundamental differences remaining between the site promoters, including the overall scale of development and the location of Stort Crossings. This was a significant issue for viability and would have a big influence on any planning framework for the area. It was discussed that the site promoters were being encouraged to work out a joined-up approach to these fundamental issues.
17. It was also the case that whilst Essex County Council seemed comfortable with a development of up to 10,000 homes, Hertfordshire County Council (HCC) had so far not expressed a view on the matter,

but appeared to be urging caution and further work. The VISUM modelling, due in November, should address the proposed Junction 7a and also clarify the wider impacts of the cumulative development in the area, including at Bishop's Stortford South, Sawbridgeworth, and 10,000 homes at the Gilston Area. East Herts explained that PBA's transport specialist planned work with HCC in order to identify a way forward.

18. The appropriateness of the approach to a DPD was discussed. It was discussed that Area Action Plans or DPDs are commonly used for large urban extensions, particularly where there are complex infrastructure matters to address. It was agreed that Officers from both Councils would seek a joint meeting with ATLAS and the Planning Advisory Service in order to obtain an independent view as to an appropriate way forward.

Scale of Development

19. Harlow Council asked whether a 'Garden City' approach to development should be pursued for the area. It was pointed out that this would require at least 15,000 homes in order to meet the definitions set out in the government's Garden Cities Prospectus and therefore to qualify for government funding.
20. East Herts Council responded that whilst any additional funding would certainly help with the feasibility and viability of development, it was doubted whether a level of development above 10,000 homes would be realistic. Although the original Ropemaker Proposals had proposed up to 25,000 dwellings in the area, this was at extremely high densities which would result in very little open space.
21. City and Provincial Properties were proposing 1,500 dwellings on their land, to add to the 8,500 dwellings proposed by Places for People. Places for People were not proposing to develop on Hunsdon Airfield, or the area around the woodlands to the north, which would be turned over to local people as some form of Community Trust. Places for People's vision for a lower-density development including significant areas of open space including Gilston Park.
22. LEP involvement was discussed. East Herts Council was engaging with Hertfordshire LEP, which was viewed as key to unlocking essential infrastructure funding.

ACTIONS

- Officers to share work on other MoUs and begin to draft an MoU for the two Councils
- Officers to arrange a joint meeting with ATLAS/PAS to investigate appropriate policy vehicles (DPD or other)
- A further Member-level meeting to be arranged once the SHMA conclusions were available.

The meeting ended at 7pm

As of 17th November 2014, Harlow Council had not responded to requests for comment on the meeting notes, but had been made aware that they are being made public.

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Terms of Reference¹

Co-operation for Sustainable Development Board

October 2014

1. Aims and Objectives

(1) The Co-operation for Sustainable Development Board will support Local Plan making and delivery for sustainable communities across geographical and administrative boundaries in West Essex, East Hertfordshire and the adjoining London Boroughs. It will do this by identifying and managing spatial planning issues that impact on more than one local planning area within West Essex, East Herts and the adjoining London Boroughs.²

- 1.1 Local authorities are required by law through the Duty to Cooperate to '*engage constructively, actively and on an on-going basis*' on planning matters that impact on more than one local planning area ('strategic planning matters'). The duty is further amplified in the National Planning Policy Framework (NPPF) which sets out the key 'strategic priorities' that should be addressed jointly³.
- 1.2 The Co-operation for Sustainable Development Board ('the Board') is responsible, on behalf of the core member authorities, for identifying the sustainable development issues that impact on more than one local planning area and agreeing how these should be managed (covering the whole local plan cycle from plan-making, through to delivery and monitoring). This may include evidence gathering. It is an advisory body, and any decisions resulting from its advice remain the responsibility of its constituent councils.
- 1.3 As part of this process, the Board will review cross boundary issues (strategic planning matters) being progressed through emerging local plans and constituent Local Development Frameworks documents as appropriate, and identify issues which are likely to be vulnerable in the legal tests applied under the Duty to Cooperate. In doing so it will consider the plans of local planning authorities outside the core membership where these are likely to impact upon more than one member authority.⁴

¹ These initial terms of reference are expected to be reviewed and updated at the start of each municipal year.

² The core constituent administrative areas are identified as Epping Forest, Harlow and Uttlesford districts, Brentwood Borough, Chelmsford City and Essex County Council, East Herts and Broxbourne districts and Hertfordshire County Council, and the London Boroughs of Waltham Forest, Redbridge and Enfield.

³ 'Strategic priorities' that local planning authorities have a duty to cooperate on are defined in Paragraph 156 of the National Planning Policy Framework (NPPF).

⁴ Initial identification of cross boundary issues will arise from the NPPF, NPPG and from issues identified at member workshops in 2014, but are expected to change as new issues arise.

(2) The Board will support better integration and alignment of strategic spatial and investment priorities in West Essex, East Herts and adjoining London boroughs, ensuring that there is a clear and defined route through the statutory local planning process, where necessary.

- 1.4 In order to support the economic growth points within the area and investor confidence, recognising the different attributes and contributions made by the individual member councils, the Board will work jointly with the Local Economic Partnerships identified in Section 4 to understand long term investment priorities and ensure that these are aligned with other public and private sector investment plans.
- 1.5 Initially the Board will seek to understand work that is already underway which is relevant to the Board's strategic planning role.

2. Membership and Accountabilities

- 2.1 The Board provides a forum for local authorities to manage issues that impact on more than one local planning area, developing the necessary evidence base and ensuring wider corporate and other relevant matters are fully taken into account. Although there is a clear emphasis on reaching a common approach on key strategic approaches, the Board is an advisory body only. Any decisions on taking forward outputs from its meetings and work programme (e.g. shared views, policy approaches, evidence or research) will be the responsibility of individual local authorities and the statutory planning process.
- 2.2 Core membership of the Board will comprise representatives from Epping Forest, Harlow and Uttlesford districts, Brentwood Borough, Chelmsford City and Essex County Council, East Herts and Broxbourne districts and Hertfordshire County Council, and the London Boroughs of Waltham Forest, Redbridge and Enfield. The GLA will be given Observer status and will be sent minutes of meetings and invited to engage at appropriate times.

Each core member authority will be invited to contribute to the work programme and to consider strategic planning issues that impact on the wider area. Other authorities may be invited to attend on an occasional basis if an issue being considered is likely to have a significant impact on the authority's planning area. Each core member authority will be represented on the Board by the relevant holder of the Planning portfolio or Leader as appropriate, to ensure confidence of authority and commitment to resources.⁵ Officers may attend meetings in support of members.
- 2.3 Regular feedback and briefing to the constituent members' political and corporate leadership is the responsibility of member representatives, and should be used as a way of ensuring wider ownership and support for the Board's work as it progresses. There should also be appropriate liaison between the local authority representatives of both the Board and the South East, Hertfordshire, Greater Cambridge and Greater Peterborough Local Economic Partnerships, and London Enterprise Panel

⁵ Councils will identify their lead member

- 2.4 The Chairman of the Board will be appointed on a rotating basis which should be reviewed at least annually to ensure fair and equal opportunities amongst the constituent member authorities. Officers of the Chairman's authority will provide administrative and clerical support to meetings.

3. Ways of Working

- 3.1 Refer to Diagram in Annex 1 for details of initial working arrangements. The Board will agree a work programme, including steering and management arrangements for each project, on an annual basis. This could include setting up 'task and finish' groups for specific projects, either reporting directly to the Board or on a shared basis with other bodies. The Board will meet regularly, as required and its meetings will rotate between Harlow, Epping Forest DC and East Herts Councils as the most convenient locations for all. In the interests of transparency, notes of the Board's meetings will be publicly available once they have been agreed.
- 3.2 The Co-operation for Sustainable Development Officer Group will provide either direct advice or support, and/or deliver agreed projects.
- 3.3 Once the work programme has been established, good project management principles should be applied, such as risk management, particularly around political sensitivities and funding, and keeping the work programme under review to ensure that it is meeting the agreed objectives and the identified priorities remain relevant.

4. Key relationships

- 4.1 **South East Local Economic Partnership:** The Board will work closely with SELEP to ensure the long term integration of strategic planning and investment priorities. The LEP plays a key support role on economic development and regeneration and is responsible for major funding streams. It is also identified in Local Planning Regulations as a body that local authorities need to take account of in meeting its 'duty to cooperate' obligations.
- 4.2 **Hertfordshire LEP:** The Board will work closely with Hertfordshire LEP to ensure the long term integration of strategic planning and investment priorities. The LEP plays a key support role on economic development and regeneration and is responsible for major funding streams. It is also identified in Local Planning Regulations as a body that local authorities need to take account of in meeting its 'duty to cooperate' obligations.
- 4.3 **Greater Cambridge and Greater Peterborough LEP:** The Board will work closely with GCGP LEP to ensure the long term integration of strategic planning and investment priorities. The LEP plays a key support role on economic development and regeneration and is responsible for major funding streams. It is also identified in Local Planning Regulations as a body that local authorities need to take account of in meeting its 'duty to cooperate' obligations.
- 4.4 **London Enterprise Panel** – this acts as the Local Economic Partnership for London.
- 4.5 **East Herts West Essex Border Liaison Group:** this is an established forum for members from many of the core Board authorities to come together and

discuss issues of common interest several times a year. Its terms of reference specifically include reference to the duty to co-operate. Its wide membership (in terms of the number of elected members invited from the constituent authorities) means that it provides a useful forum for the Board to communicate on its activities, and receive updates on issues. The Chairman of the Board or an agreed member should report to each meeting of the EHWEBLG.

- 4.6 **London Stansted Cambridge Consortium:** this is an established partnership of public and private sector organisations, including councils, which covers the area from Tech City, the City Fringe, Kings Cross, and the Olympic Park, up through the Lee Valley and M11/A10 and West Anglia Rail corridors to Harlow and Stansted, and through to Cambridge. The principal objective of the consortium is to drive economic development and enhance quality of life in the north London – Stansted – Cambridge corridor. This means not only driving job growth through productivity and investment, but more importantly increasing economic activity, by ensuring local communities access employment opportunities.
- 4.7 **Other Key Partners:** A number of key bodies and organisations will be necessary to support the work of the Board either through direct support/advice or through joint projects. Most of these will be subject to the legal requirements of the ‘duty to cooperate’ and may well already be involved in the other partnerships mentioned above. Key bodies include the Lee Valley Regional Park, the Corporation of the City of London (responsible for Epping Forest), the Environment Agency, Highways Agency, and Homes and Communities Agency. Private sector infrastructure providers, particularly utility companies, will also be key partners particularly in terms of ensuring alignment between investment plans and priorities.

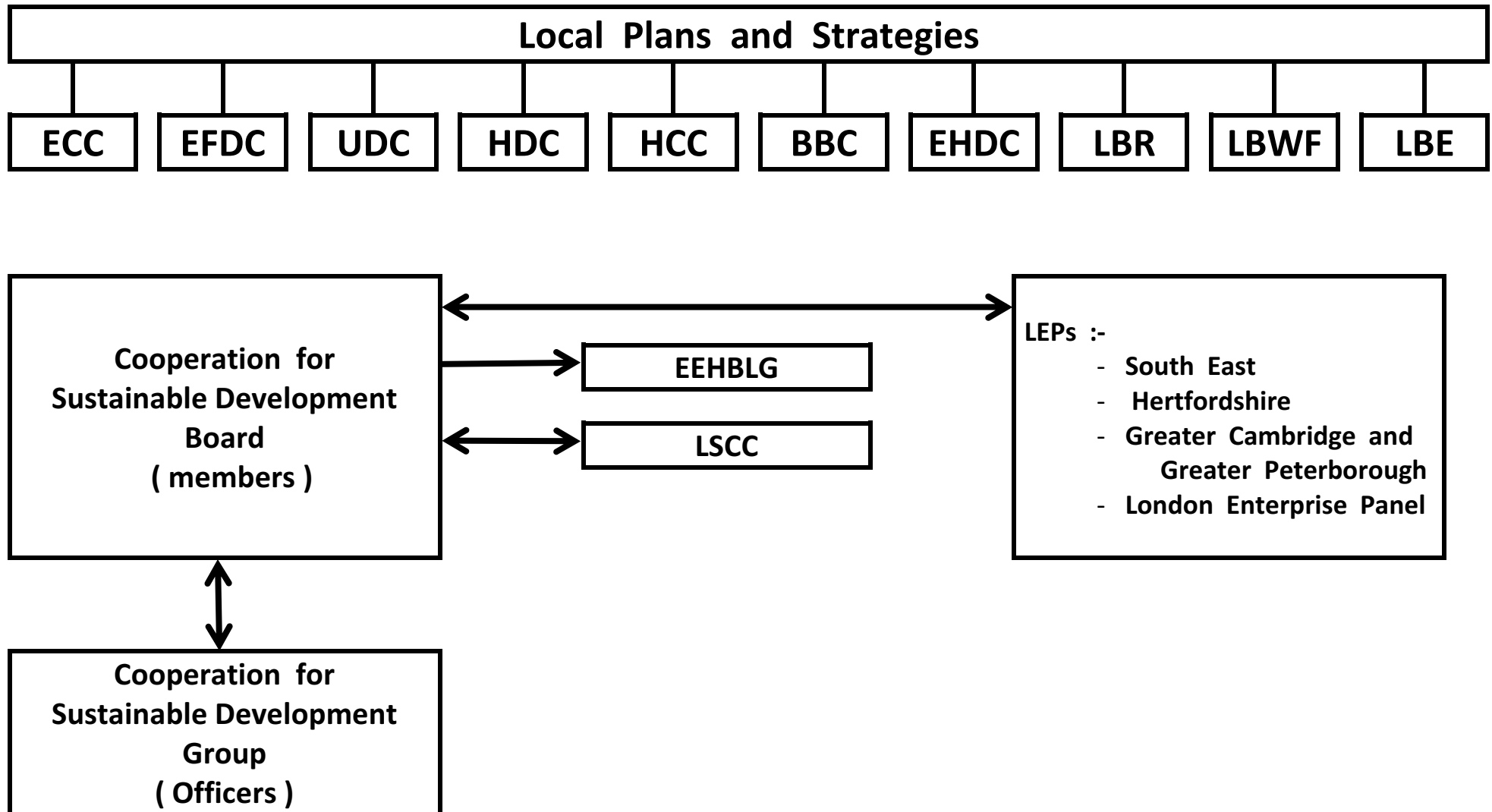
5 Technical Support

- 5.1 The Board will be supported by an officer group, known as the Co-operation for Sustainable Development Group, with representatives from each of the constituent authorities. The group will advise the Board on technical issues, and act as a steering group for any identified project, establishing suitable technical support and project management arrangements for each. This may involve the use of ‘task and finish’ groups and could include the use of external expertise e.g. from key statutory bodies identified in Section 4 above or the use of consultants. The group will therefore also be responsible for any necessary joint procurement arrangements.
- 5.2 A representative of the officer group (the chairman or a suitable substitute) will attend the Board meetings and provide regular progress updates on the work programme to the Chairman.

6. Review

- 6.1 These are initial terms of reference, and will be formally reviewed before May 2015. It is important to keep arrangements flexible to respond to changes in planning policy, priorities and work programmes and to move forward from plan policy development stages to implementation. It is therefore anticipated that the terms of reference will continue to be reviewed annually.

ANNEX 1



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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 8 DECEMBER 2014 EXECUTIVE – 6 JANUARY 2015

REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING AND TRANSPORT

DRAFT DISTRICT PLAN CHAPTERS 17 – 19: 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 17 – 19 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.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE</u> <u>PANEL AND EXECUTIVE: That:</u>	
(A)	the issues raised in respect of Chapters 17-19 of the Draft District Plan Preferred Options, as detailed at Essential Reference Papers B, C, and D 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 and D to this report, be noted; and
(C)	the draft revised chapters, as detailed in Essential Reference Papers B, C and D 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 three topic chapters: Chapter 17 Transport; Chapter 18 Community Facilities, Leisure and Recreation; and Chapter 19 Natural Environment. **Essential Reference Papers 'B' to 'D'** each contain an Issues Report and a Working Draft Revised Chapter for each topic, which should be read together.

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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IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):	<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>
Consultation:	The Report refers to the Draft District Plan consultation carried out between 27 th February and 22 nd May 2014.
Legal:	There are no legal implications as a result of this Survey.
Financial:	There are no direct financial implications of this Report.
Human Resource:	The continuing work on the Draft District Plan is a considerable burden on human resources.
Risk Management:	None
Health and wellbeing – issues and impacts:	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.

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17 Transport

17.1 Introduction

- 17.1.1 National and local policies and guidance seek a reduction in the growth of car usage and the greater use of more sustainable modes of transport.
- 17.1.2 Locally, the over-arching transport policy document for the area is Hertfordshire's Local Transport Plan (HCC, 2011) (LTP3), which sets the framework for achieving a better transport system in Hertfordshire for the plan period 2011-31. The LTP has a number of associated daughter documents containing their own initiatives including: the Rail Strategy, Bus Strategy, Intalink Strategy, Cycling Strategy, Walking Strategy, Rural Strategy, Road Safety Strategy, and Rights of Way Improvement Plan.

The Hertfordshire Local Transport Plan 2011 can be viewed and downloaded at: www.hertsdirect.org/services/transtreets/tranpan/ltp/

- 17.1.3 Although the LTP identifies some specific schemes for implementation in the district, the majority of transport schemes ~~are~~ have been identified through a rolling programme of Urban Transport Plans (UTPs) which identify how and where the strategic objectives and targets detailed in the county-wide LTP can be delivered at a local level. There ~~are two~~ is one adopted UTPs affecting East Herts; the Hertford and Ware Urban Transport Plan (HCC, November 2010), ~~and the emerging Bishop's Stortford and Sawbridgeworth Urban Transport Plan,~~ which will be refreshed as appropriate. For areas where significant development is planned or anticipated, HCC is in the process of introducing Growth & Transport Plans, to ensure that appropriate transport infrastructure (including optimal packages of measures) is identified and also that they be used to help to inform future potential major transport scheme decisions.

The Hertford and Ware Urban Transport Plan can be viewed and downloaded at:
www.hertsdirect.org/services/transtreets/tranpan/tcatp/handwutp.pdf

- 17.1.4 While the primary responsibility for the delivery of transport provision in the district lies with Hertfordshire County Council as Highway Authority, East Herts Council has involvement in some aspects, mainly via the planning system, community transport, and the management and enforcement of parking.
- 17.1.5 New development can aid the improvement of the transport offer in the district by making the best use of existing infrastructure (including passenger transport), providing new components where necessary, and also by contributing to the improvement of passenger transport provision, walking and cycling. In enabling access to new development, the provision of safe sustainable travel alternatives can make these sustainable modes more attractive to users than the car. If provided from the outset they can help instil green travel patterns (which are harder to establish later), and as a consequence assist in reducing the carbon footprint made by the transport sector. “Green streets”, designed with a strong landscaped structure (which may include, trees, shrubs, verges and sustainable drainage systems), can assist in urban greening and their high amenity value can encourage walking and cycling.
- 17.1.6 Priority should focus on locating new residential development in close proximity to employment, retail, educational and leisure facilities and services, where good passenger transport exists, or where infrastructure and service provision can be improved. This approach can aid the local economy by supporting local services and facilities. Concentrating development in sustainable locations can also help benefit the wider economy via a reduction in congestion caused by additional generated trips over those occasioned by a more widely disbursed development pattern.

- 17.1.7 Green Travel Plans can also help assist in modal shift e.g. via lift sharing schemes. Nonetheless, within the rural parts of the district the dispersed settlement pattern with related lower levels of passenger transport provision and attendant high levels of car dependency make the provision of realistic alternatives to the private car more challenging. Therefore, while supporting and encouraging a reduction in car usage, it is necessary to recognise the importance of private motorised transport in enabling the population of more rural locations to access key facilities and services.

17.2 Sustainable Transport

- 17.2.1 The District Council, in recognising that the achievement of sustainable development underpins national planning policy, seeks to promote sustainable transport and improve accessibility as an important part of its District Plan policy approach. Key issues to be addressed include:

1. Minimising the need to travel;
2. Increasing choice and availability of sustainable transport options;
3. Prioritising sustainable travel modes in new developments;
4. Increasing connectivity and integration of sustainable transport modes;
5. Encouraging healthy communities by supporting walking and cycling;
6. Reducing congestion and carbon-dioxide emissions.

- 17.2.2 Therefore, ~~where possible~~, strong emphasis will be placed on seeking the provision of new bus, cycle and pedestrian transport routes and networks in addition to extending and strengthening existing provision.

- 17.2.3 It is, however, acknowledged by the Government that “different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions

will vary from urban to rural areas” (Paragraph 29, NPPF, CLG, 2012). Therefore, where new development is sited away from urban areas it is recognised that there may be reduced scope for passenger transport service and/or other sustainable transport provision in some locations. However, every effort should be made to ensure that the best possible sustainable transport outcomes can be achieved for all new developments, irrespective of remoteness of location, and developers will be expected to demonstrate where specific circumstances indicate otherwise.

Policy TRA1 Sustainable Transport

I. To achieve accessibility improvements and promotion of sustainable transport in the district, development proposals should:

(a) Primarily be located in places which enable sustainable journeys to be made to key services and facilities to help aid carbon emission reduction;

(b) Comply with the provisions of the Local Transport Plan;

(c) Ensure that a range of alternative transport options are available to occupants or users, which may involve the improvement of pedestrian links, cycle paths, and passenger transport network (including bus and/or rail facilities). These improvements could include the creation of new routes, services and facilities or extensions to existing infrastructure and which could also incorporate off-site mitigation, as appropriate. In suitable cases the provision of footways and cycle paths alongside navigable waterways may be sought, along with new moorings where appropriate. The implementation of car sharing schemes should also be considered;

(d) Prioritise the provision of modes of transport other than the car (particularly walking, cycling and, where appropriate, passenger transport) both within well connected site layouts and, where possible feasible, providing easy and direct access to key services and facilities;

(e) In the construction of major schemes, allow for the early implementation of sustainable travel infrastructure or initiatives that influence behaviour to enable green travel patterns to become established from the outset of occupation;

(f) Protect existing rights of way, cycling and equestrian routes (including designated routes and, where there is evidence of regular public usage, informal provision) and, should diversion prove unavoidable, provide replacement alternative appealing routes to equal or enhanced standards; and

(g) Ensure that provision for the long-term maintenance of any of the above measures (c) (d) and (f) that are implemented is assured.

II. Where appropriate, contributions may be required towards the facilitation of strategic transportation schemes identified in the Local Transport Plan and other related strategies.

III. In order to minimise the impact of travel on local air quality, where major developments involve the introduction of new bus routes or significant changes to existing routes, service providers will be required, in agreement with Hertfordshire County Council's Transport, Access and Safety Unit, to ensure that the vehicles serving these locations will either be of 'hybrid' type or meet the latest 'Euro' emissions regulations.

17.3 ~~Highway Safety and Trip Generation~~ Safe and Suitable Highway Access Arrangements and Mitigation

17.3.1 In designing new developments it is important that proposed access arrangements are both safe for users and suitable for the type of development and number of users proposed and trips predicted to be generated. Where additional trips are predicted from a site it is necessary to ensure that measures can commensurately mitigate the impact where possible. ~~and~~ While the NPPF is clear that "development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe" (Paragraph 32, NPPF, CLG, 2012), developers should be able to demonstrate that transport provision associated with development proposals will be appropriate, both in terms of modal choice and the

capacity of the highway network to accommodate additional trips.

- 17.3.2 However, it is important that proposed mitigation measures should not only achieve their transport objective but also respect the character of the area and not have a significant adverse effect on the wider environment and the amenity of local residents, e.g. through unacceptable trip generation levels, displacement parking, etc.

Policy TRA2 Highway Safety and Trip Generation Safe and Suitable Highway Access Arrangements and Mitigation

Development proposals should ensure that safe and suitable access can be achieved for all people. Site layouts, access proposals and any measures designed to mitigate trip generation produced by the development should:

- (a) Be acceptable in highway safety terms;
- (b) Not result in any severe residual cumulative impact; and
- (b) Not have a significant detrimental effect on the character of the local environment.

17.4 Vehicle Parking Provision

- 17.4.1 The amount of parking provision associated with development can have a significant effect on the mode of transport used to access it. The restriction of provision at destination points can lead to greater use of sustainable transport from place of origin instead of car usage.
- 17.4.2 While the benefits of such restrictions are recognised in terms of reduced congestion, vehicle emissions etc, it is also important to ensure that they do not lead to displacement parking to other areas. Maintaining the vitality and viability of the district's market towns and service centres is also of key importance. Therefore, a balance needs to be achieved between restricting parking provision in new developments and

ensuring that sufficient provision is made, while also ensuring that suitable parking facilities for cycles and powered two-wheelers are provided to encourage modal shift to sustainable transport options.

- 17.4.3 The Council's Supplementary Planning Document 'Vehicle Parking Provision at New Development' sets out the amount of parking spaces that should be provided in association with development and also offers guidance concerning the design and layout of such provision.

The Vehicle Parking Provision at New Development Supplementary Planning Document (2008, or as amended) can be viewed and downloaded at: www.eastherts.gov.uk/vehicleparking

- 17.4.4 It is important that the most efficient use is made of land. Therefore, where a car park is proposed for non-domestic use, it is sensible to consider whether it would be appropriate to allow for shared public use of the facility, as this may help to ease pressure for additional provision, especially when located in proximity to town centres or at retail centres.

Policy TRA3 Vehicle Parking Provision

I. Vehicle parking provision associated with development proposals will be assessed on a site-specific basis in accordance with the provisions of the District Council's currently adopted Supplementary Planning Document 'Vehicle Parking Provision at New Development'.

II. Provision of sufficient secure, covered and waterproof cycle and, where appropriate, powered two-wheeler storage facilities should be made for users of developments for new residential, educational, health, leisure, retail, employment and business purposes (to be determined on a site-specific basis). These should be positioned in easily observed and accessible locations.

III. Car parking should be integrated as a key element of design in development layouts to ensure good quality, safe, secure and attractive environments.

IV. Where a private car park for non-domestic use is proposed, the Council will assess whether it should also be available for shared public use having particular regard to the needs of the primary user.

V. Where public car parks (including those for Park and Ride facilities) are proposed, or where car parks are to be provided associated with major development involving educational, health, leisure, retail, employment and business uses, provision should be made for charging points for low and zero carbon vehicles (to be determined on a site-specific basis).

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
Introduction				
17.1	17	A road link from East to West is desirable.	The limitations of existing east-west travel are acknowledged and this matter was raised in the Issues and Options consultation document; however, it is beyond the scope of this Plan to seek a solution to this long-standing issue, which would fall under the responsibility of the local highway authority.	No amendment in response to this issue
17.2	17	The Plan makes no reference to required road improvements including widening the A1(M), a link road from the A10 to the M11, a Hertford bypass, a Royston bypass and a link from the A1(M) to the M1.	Detailed transport modelling work is currently ongoing, working with neighbouring authorities where appropriate, in order to understand the potential impact of development on both the strategic and local highway networks, and any mitigation measures that may be required. Any infrastructure requirements will be identified within the Infrastructure Delivery Plan which will include information on how and when specific schemes will be delivered.	No amendment in response to this issue
17.3	17	There needs to be consideration of parking and through traffic as part of any development. There have been no improvements to Sacombe Road following development in that area.	<p>Detailed transport modelling work is currently ongoing, working with neighbouring authorities where appropriate, in order to understand the potential impact of development on both the strategic and local highway networks, and any mitigation measures that may be required. Any infrastructure requirements will be identified within the Infrastructure Delivery Plan which will include information on how and when specific schemes will be delivered.</p> <p>Policy TRA3 concerns vehicle parking provision.</p>	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
17.4	17	The Little Hadham bypass should be turned into a dual carriageway from the M11 to the A10 with later extension to the M1.	<p>The Little Hadham bypass seeks to relieve congestion and improve the amenity of local residents in that local area.</p> <p>The limitations of existing east-west travel are acknowledged and this matter was raised in the Issues and Options consultation document; however, it is beyond the scope of this Plan to seek a solution to this long-standing issue, which would fall under the responsibility of the local highway authority.</p>	No amendment in response to this issue
17.5	17	Despite development, Ware town centre has kept its character. It is hoped that this will be maintained.	Noted. Part 6 of the Vision statement on page 17 of the Preferred Options District Plan refers to the need for carefully planned development which recognises the importance of preserving and enhancing the historic character of the main towns, including Ware. Furthermore, any effects on Ware Town Centre will be taken into account in the preparation of the proposed Development Plan Document, which would act as a Masterplan for the Area to the North and East of Ware (draft Policy WARE3).	No amendment in response to this issue
17.6	17	The A414 through Hertford is already very heavily congested at peak times.	The constraints of this route are well known and investigations are being undertaken by HCC to seek to mitigate congestion as part of ensuring that the highway network can operate with the additional development proposed in the Plan.	No amendment in response to this issue
17.7	17	Improvements to the A602 between Ware and Stevenage will only have a marginal impact on journey times.	Hertfordshire County Council, as the Highway Authority, is seeking to increase the capacity of certain junctions on the A602 in order to ease congestion at various 'pinch' points on the route between Ware and Stevenage.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
			Detailed transport modelling work is currently ongoing, working with neighbouring authorities where appropriate, in order to understand the potential impact of development on both the strategic and local highway networks, and any mitigation measures that may be required. Any infrastructure requirements, outside those proposed as part of the HCC A602 Improvement Works, will be identified within the Infrastructure Delivery Plan which will include information on how and when specific schemes will be delivered.	
17.8	17	The Little Hadham bypass is supported but improvements to the Bishop's Stortford bypass may be necessary along with a bypass of the town centre from the south of the town to provide an alternative route to Stansted Airport.	Detailed transport modelling work is currently ongoing, working with neighbouring authorities where appropriate, in order to understand the potential impact of development on both the strategic and local highway networks, and any mitigation measures that may be required. Any infrastructure requirements will be identified within the Infrastructure Delivery Plan which will include information on how and when specific schemes will be delivered.	No amendment in response to this issue
17.9	17	There is no mention of managing increased rail demand into London. The level of housing proposed is not sustainable for the current level of infrastructure. More information about Crossrail 2 is required before development takes place.	Discussions have taken place during the plan making process with the relevant Train Operating Companies and Network Rail and are ongoing. These bodies will continue to have an opportunity to respond to emerging development proposals as work on the District Plan progresses. Hertfordshire County Council is currently in the process of updating its Rail Strategy which will also influence how train services	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
			<p>can adapt to growing demand.</p> <p>Proposals for Crossrail 2 are at an extremely early stage and it is currently not fully determined where the route would terminate at the northern point. In this respect it is therefore unknown whether it would still be intended to utilise the Hertford East branch line when delivered. Although it is anticipated that the core section of the route would be on stream around 2032, the peripheral route sections have yet to be fully determined. Therefore, as the known proposed core route would not extend northward beyond Tottenham Hale, it is not considered that the current Network Rail/TfL proposal to protect the route, maybe extending as far as Cheshunt, would impact upon the Development Strategy for East Herts to 2031.</p>	
17.10	17	The A120 bypass needs to include Standon and Puckeridge too otherwise the bottleneck at Little Hadham will just be moved there instead.	<p>The benefits of providing a potential bypass for Standon and Puckeridge are recognised, although it is not clear at the present time how such a scheme would be funded or delivered. Hertfordshire County Council, as the Highway Authority, took the decision in 2006 to focus on seeking to fund two separate local bypasses, with a decision to prioritise Little Hadham first. A commitment was made to look at options for Standon/Puckeridge once the Little Hadham bypass had been delivered. Therefore, as HCC would be the responsible authority for delivering such a bypass, this issue falls outside the remit of the District Plan.</p>	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
17.11	17	There should be mention of improved travel to the North of England.	Improving travel links to other parts of the country beyond the benefits of those schemes already identified, falls outside the remit of the District Plan.	No amendment in response to this issue
17.12	17	The Highways Agency indicate that it is important that sustainable transport solutions are available within any development that comes forward in the Gilston Area and that co-operation between authorities is necessary in order to ensure the development is well integrated with the existing urban area of Harlow.	Noted and agreed. Policy TRA1 (Sustainable Transport) and Policy GA1 (Land in the Gilston Area) include a requirement to make provision for different modes of sustainable transport in accordance with the Local Transport Plan. These measures would further be incorporated into the Development Planning Document for the area, in due course. Detailed discussions with HCC, Harlow Council, passenger transport providers and other bodies are ongoing.	No amendment in response to this issue
17.13	17	The Highways Agency indicate that the fact that the number of jobs proposed does not match the level of housing may result in greater levels of out commuting from East Herts, potentially resulting in greater impact on the highway network.	East Herts is a mainly rural district which, by its nature, is partly reliant on larger neighbouring urban areas to meet the employment needs of its residents, e.g. it has an historic pattern of rail commuting into London. Nevertheless, the District Plan seeks to provide for a significant number of additional jobs over the Plan period, including through the delivery 11-13 hectares of new employment land.	No amendment in response to this issue
17.14	17	The Highways Agency emphasise the importance of a robust evidence base which evaluates the cumulative and individual impacts of development on road links and junctions. Any funding shortfalls for infrastructure provision should be identified at an early stage. The work done to date does not fully determine the operation of the strategic road network following implementation of all District Plan development. It is therefore not currently known if any showstoppers exist. There is concern with the following junctions:	Detailed transport modelling work is currently ongoing, working with neighbouring authorities where appropriate, in order to understand the potential impact of development on both the strategic and local highway networks, and any mitigation measures that may be required. Any infrastructure requirements will be identified within the Infrastructure Delivery Plan which will include information on how and when	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
		<ul style="list-style-type: none"> • M11 Junction 7 • M11 Junction 8 • M25 Junction 25 • A1(M) Junctions 3-6 	specific schemes will be delivered.	
17.15	17	The Highways Agency is supportive of improving cycling and walking links to and from development sites and encouraging the use of public transport. However, it would be useful if the evidence base indicated how this would be achieved for each development site.	Support noted and welcomed. Policy TRA1 of the Preferred Options District Plan identifies the kind of sustainable transport solutions that should be provided as part of new developments. Planning Applications should be informed by this policy along with the provisions contained within the Local Transport Plan and Urban Transport Plans (where applicable). The detail of such proposals will therefore be agreed through the planning application process.	No amendment in response to this issue
17.16	17	HCC suggest that at Pre-Submission stage there is a requirement for outline mitigation measures to be identified including broad cost estimates, indicative delivery timescales and an identification of funding sources. HCC will assist with this and advise on the technical work that is required and provide access to existing traffic and transport data and models. HCC have provided a table which outlines the evidence that currently exists for the emerging preferred options sites as well as identifying gaps. Modelling needs to take account of growth in neighbouring areas.	<p>Support from the County Council on this key issue is gratefully received and it is hoped that discussions will continue as work on the emerging Plan continues.</p> <p>It is acknowledged that a schedule of required infrastructure, including funding and delivery timescales will be required. This will take place through the Infrastructure Delivery Plan, work which is currently underway, and which HCC, as highway authority, is involved with.</p>	No amendment in response to this issue
17.17	17	HCC suggest that there is a risk that no viable solutions may be found in relation to online improvements on the A414 in Hertford or on the A10 and that improvements identified as part of the Welwyn Hatfield Local Plan modelling and design work may be insufficient to accommodate large scale development for both districts in the south east WGC area.	<p>Capacity constraints relating to the A414, particularly through Hertford, are recognised.</p> <p>The Council will continue to work with the County Council, Welwyn Hatfield Council and other relevant bodies in order to understand the potential impacts of development on the strategic and local highway networks, and any mitigation measures that maybe required.</p>	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
17.18	17	HCC seek assurance that Network Rail and the train operating companies have been consulted as part of the development of the Plan. Confirmation should be sought that both station and rail infrastructure is able to cope with likely demands placed upon it in respect of the preferred development sites.	Discussions have taken place during the plan making process with the relevant Train Operating Companies and Network Rail and are ongoing. These bodies will continue to have an opportunity to respond to emerging development proposals as work on the District Plan progresses.	No amendment in response to this issue
17.19	17	HCC seek assurance that, in relation to bus services, development is situated in locations where there are existing services and where new services could be provided long term which would not be reliant on HCC funding.	<p>The proximity of sites to modes of sustainable transport forms part of the site assessment process within the Sustainability Appraisal.</p> <p>Where new or extended bus routes are required, contributions from developers will be expected to ensure their viability in the initial years of their operation and help establish green travel patterns. Patronage would subsequently need to be of a sufficient level to ensure services are retained.</p>	No amendment in response to this issue
17.20	17	Essex County Council considers that the draft plan is consistent with the NPPF in terms of ensuring that developments generating significant movement are located where the need to travel will be minimised and the use of sustainable modes maximised. However the Plan should provide details on types of sustainable transport measures to be delivered.	Support noted and welcomed. Policy TRA1 of the Preferred Options District Plan identifies the kind of sustainable transport solutions that should be provided as part of new developments. Planning Applications should be informed by this policy along with the provisions contained within the Local Transport Plan and Urban Transport Plans (as appropriate). The detail of such proposals will therefore be agreed through the planning application process.	No amendment in response to this issue
17.21	17	<p>Essex County Council suggest that the chapter should include the following:</p> <ul style="list-style-type: none"> Ensuring that emerging plans relate to existing cycle and walking networks. Policies should promote accessibility for all Reference should be made to car clubs, cycle 	Policy TRA1 identifies a need to deliver sustainable transport solutions within new developments including improved pedestrian and cycling links. The policy also promotes the implementation of car sharing schemes.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
		<p>storage and EV charging points</p> <ul style="list-style-type: none"> Consideration should be given to the potential for 'car free' developments if they are located close to town centres. 	<p>Policy TRA3 requires provision of sufficient secure, covered and waterproof cycle storage facilities. It also identifies a requirement for the provision of charging points for low and zero carbon vehicles within car parks.</p> <p>It is recognised that the NPPF seeks to promote the use of sustainable transport in order to reduce greenhouse gas emissions and congestion. Sites near town centre locations are close to services and facilities, including modes of sustainable transport, and therefore a reduced provision of car parking spaces maybe appropriate. This is reflected in the currently adopted Vehicle Parking at New Developments SPD. Car parking standards will be reviewed as part of ongoing work on the District Plan.</p>	
17.22	17	<p>Broxbourne Borough Council suggests that there is little mention of public transport improvements including Crossrail 2. Should Crossrail 2 terminate at Broxbourne then there is concern that East Herts residents may drive and park at stations in in the Borough, adding additional pressure. There is little detail on the cumulative impact of development on the A10. Broxbourne Borough Council is willing to share the results of their own transport study once complete. The Council is keen to discuss this and other cross boundary issues through the Duty to Co-operate.</p>	<p>Proposals for Crossrail 2 are at an extremely early stage and it is currently not fully determined where the route would terminate at the northern point. In this respect it is therefore unknown whether it would still be intended to utilise the Hertford East branch line when delivered. Although it is anticipated that the core section of the route would be on stream around 2032, the peripheral route sections have yet to be fully determined. Therefore, as the known proposed core route would not extend northward beyond Tottenham Hale, it is not considered that the current Network Rail/TfL proposal to protect the route, maybe extending as far as Cheshunt, would impact upon the Development Strategy for East Herts to 2031.</p>	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
			Detailed transport modelling work is currently ongoing, working with neighbouring authorities where appropriate, in order to understand the potential impact of development on both the strategic and local highway networks, including the A10, and any mitigation measures that may be required. The continued co-operation of Broxbourne Borough Council on this, and other strategic issues, is welcomed.	
17.23	17	People will continue to travel by car rather than using public transport.	The NPPF requires that transport policies in local plans should seek to balance the transport system in favour of sustainable transport modes. While it is recognised that the district's dispersed settlement pattern will result in a certain level of car borne traffic, the policies contained in the emerging District Plan aim to facilitate a step change away from car usage, where sustainable travel choices exist.	No amendment in response to this issue
17.24	17.1	New development will add significant traffic to a road system that is already gridlocked.	While constraints on the road network lead to congestion hotspots in some locations in the district, especially at peak times, no area in East Herts would be classified by the highway authority as being 'gridlocked' on a regular basis as traffic does keep moving, albeit at a slower rate. Detailed transport modelling work is currently ongoing, working with neighbouring authorities where appropriate, in order to understand the potential impact of development on both the strategic and local highway networks, and any mitigation measures that may be required. Any infrastructure requirements will be identified	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
			within the Infrastructure Delivery Plan which will include information on how and when specific schemes will be delivered.	
17.25	17.1	The chapter does not discuss relationships between transport and development. It does not consider the role of access in supporting development aims, especially in terms of economic and social features. Aims might include provision of quality pedestrian links to very local shops and community facilities or of bus services to local and town centres. Policy TRA1 does refer in I.(d) to “..easy and direct access to key services and facilities ...” but only “... where possible ...”.	Agreed in part. While it is considered that these relationships are implicit throughout the Plan, additional text to the end of 17.1.6 could strengthen the wording. In terms of Policy TRA1 it is agreed that ‘possible’ may be open to misinterpretation. The policy is designed to ensure that only in cases where the provision of ‘easy and direct access to key services and facilities’ would not be achievable e.g. due to matters such as insurmountable physical constraints, would this part of the criteria not apply. Therefore ‘possible’ should be replaced with ‘feasible’ to strengthen policy wording.	Amendment to text (Para 17.1.6) Additional wording to end of paragraph: <u>This approach can aid the local economy by supporting local services and facilities. Concentrating development in sustainable locations can also help benefit the wider economy via a reduction in congestion caused by additional generated trips over those occasioned by a more widely disbursed development pattern.</u> Amendment to policy (TRA1 (d)) (d) Prioritise the provision of modes of transport other than the car (particularly walking, cycling and, where appropriate, passenger transport) both within well connected site layouts and, where possible feasible , providing easy and direct access to key services and facilities;

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
17.26	17.1	In addition to personal travel, provision needs to be made for movement of goods and materials. Even in residential areas, delivery and service vehicles generally form an important element of traffic.	The development management process ensures that the highway authority is satisfied with the access arrangements of any new development to ensure that it is suitable in such respects e.g. refuse vehicles. It is not considered necessary to include additional text on this point.	No amendment in response to this issue
17.27	17.1	To be fully effective, transport policies need to be reflected in design and priority principles set out for other topic areas, such as Employment, Retail and Design.	The District Plan is intended to be read as a whole and, as sustainable development is fundamentally intrinsic to the strategy, it is not considered that it would benefit from repetition.	No amendment in response to this issue
17.28	17.1.2	Criticism of the Local Transport Plan.	LTP3 is an adopted document produced by HCC and is not the subject of consultation at this stage.	No amendment in response to this issue
	17.1.2	East- west travel difficulties highlighted.	The limitations of existing east-west travel are acknowledged and this matter was raised in the Issues and Options consultation document; however, it is beyond the scope of this Plan to seek a solution to this long-standing issue, which would fall under the responsibility of the local highway authority.	No amendment in response to this issue
17.29	17.1.2	Impact of the A120 improvement through by-passing Hadham adds to the speeding and other pressures at Standon.	The issue is beyond the scope of this Plan and would fall under the responsibility of the local highway authority to address in conjunction with its proposals for the Little Hadham Bypass.	No amendment in response to this issue
17.30	17.1.2	Rerouting sought for A414 through Hertford	While the constraints of this route are well known and investigations are being undertaken by HCC to seek to mitigate congestion as part of ensuring that the highway network can operate with the additional development proposed in the Plan, there are no current plans for a bypass of	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
			Hertford. The issue is beyond the scope of this Plan and would fall under the responsibility of the local highway authority.	
17.31	17.1.3	Criticism of the Hertford and Ware Urban Transport Plan which is considered out of date. No transport infrastructure is being delivered to support development, for instance at the development North of Hertford.	<p>The Hertford and Ware Urban Transport Plan is an adopted document produced by HCC and is not the subject of consultation at this stage.</p> <p>Detailed transport modelling work is currently ongoing with HCC, working with neighbouring authorities where appropriate, in order to understand the potential impact of development on both the strategic and local highway networks, and any mitigation measures that may be required. Any infrastructure requirements will be identified within the Infrastructure Delivery Plan which will include information on how and when specific schemes will be delivered.</p>	No amendment in response to this issue
17.32	17.1.3	More needs to be done to encourage walking and cycling than is proposed by the Hertford and Ware Urban Transport Plan.	<p>The Hertford and Ware Urban Transport Plan is an adopted document produced by HCC and is not the subject of consultation at this stage.</p> <p>The NPPF requires that transport policies in local plans should seek to balance the transport system in favour of sustainable transport modes. While it is recognised that the district's dispersed settlement pattern will result in a certain level of car borne traffic, the policies contained in the emerging District Plan aim to facilitate a step change away from car usage, particularly through the provision of enhanced walking and cycling links, as required by Policy TRA1.</p>	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
17.33	17.1.4	The Council is planning for new development but is powerless to make any significant improvement to major transport bottlenecks.	Detailed transport modelling work is currently ongoing, working with neighbouring authorities where appropriate, in order to understand the potential impact of development on both the strategic and local highway networks, and any mitigation measures that may be required. Any infrastructure requirements will be identified within the Infrastructure Delivery Plan which will include information on how and when specific schemes will be delivered.	No amendment in response to this issue
17.34	17.1.5	Buntingford could be relatively easily re-connected to the railway network. Network Rail should add more track capacity on the line to Liverpool Street.	Discussions have taken place during the plan making process with the relevant Train Operating Companies and Network Rail. These are ongoing and they will continue to have an opportunity to respond to emerging development proposals as work on the District Plan progresses. The issue of re-connecting Buntingford to the railway network falls outside of the scope of the District Plan and would be unlikely to be delivered within the plan period to 2031.	No amendment in response to this issue
17.35	17.1.5	More needs to be done to encourage walking and cycling than is proposed by the Hertford and Ware Urban Transport Plan.	The Hertford and Ware Urban Transport Plan is an adopted document produced by HCC and is not the subject of consultation at this stage. The NPPF requires that transport policies in local plans should seek to balance the transport system in favour of sustainable transport modes. While it is recognised that the district's dispersed settlement pattern will result in a certain level of car borne traffic, the policies contained in the emerging District	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
			Plan aim to facilitate a step change away from car usage, particularly through the provision of enhanced walking and cycling links, as required by Policy TRA1.	
17.36	17.1.6	General support	Support noted and welcomed.	No amendment in response to this issue
17.37	17.1.7	It is totally unrealistic to reduce car dependence.	The NPPF requires that transport policies in local plans should seek to balance the transport system in favour of sustainable transport modes. While it is recognised that the district's dispersed settlement pattern will result in a certain level of car borne traffic, the policies contained in the emerging District Plan aim to facilitate a step change away from car usage.	No amendment in response to this issue
Sustainable Transport				
17.38	17.2	The Plan should identify a web of footpaths, crossings, bus stops and cycleways to which developments can make a connection. Sites must link adequately to existing developments and town centres.	Policy TRA1 (C) identifies the need to ensure that a wide range of alternative transport options are available, including through the improvement of, or extension to, existing links, paths and routes. This detailed issue would be agreed through the planning application process.	No amendment in response to this issue
17.39	17.2.2	The sentence is weak and should not say 'where possible'. Sustainable transport infrastructure must be built.	Agreed that the wording of the sentence could be made stronger.	Amendment to text (Para 17.2.2): Therefore, where possible , strong emphasis will be placed on seeking the provision of new bus, cycle and pedestrian transport routes and networks in addition to extending and strengthening existing provision.

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
17.40	Policy TRA1	The Canal and River Trust supports the use of towpaths as sustainable transport routes. Contributions should be sort to achieve improvements to sustainable transport infrastructure. It is hoped that the policy is not only seeking provision of new infrastructure where moorings might be created. It is not considered necessary for the policy to make the link between provision of moorings and towpath improvement.	Support noted and welcomed. Contributions to all forms of transport infrastructure from new developments are currently sought, where appropriate, on the basis of Hertfordshire County Council's Toolkit. The policy seeks the provision of new and improved pedestrian and cycle links, and where appropriate, new moorings. Provision of moorings in suitable locations may help to reduce car usage and give people greater choice about how they travel, in accordance with Paragraph 29 of the NPPF.	No amendment in response to this issue
17.41	Policy TRA1	The removal of car parking in towns will not lead to healthy town centres. Such policies will cause people to drive further away to areas where there is adequate parking (Welwyn) or a good park and ride service (Cambridge) or out of town centres (Brookfield).	The policies contained in the emerging District Plan do not propose to reduce the number of public car parking spaces in town centres, but seek to improve sustainable transport links in order to help secure a step change away from car usage.	No amendment in response to this issue
17.42	Policy TRA1	The policy throws together walking, cycling and public transport without defining the different characteristics of each. There should be a policy for each.	Policy TRA1 seeks to encourage a modal shift away from car use by improving provision and access to sustainable modes of transport in accordance with Paragraph 29 of the NPPF. It is recognised that different modes of transport have different characteristics and requirements and these details would be addressed at the planning application stage.	No amendment in response to this issue
17.43	Policy TRA1	The policy should not include elements relating to service provision such as car sharing and bus engine types. They should be included within an appendix or separate document which can be updated.	It is considered that elements such as car sharing and bus engine types should be contained within policy in order to ensure that these aims are given the strongest possible weight during the planning application process.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
17.44	Policy TRA1	A new town could have all required infrastructure in place, including a new rail link.	The option of developing a new settlement in the District was assessed alongside all other development strategy options as part of the preparation of the Preferred Options District Plan. While pursuing this option could provide the critical mass of development required to deliver significant infrastructure projects, it was considered that, overall, such a strategy would be less sustainable than other options and would be unlikely to be delivered within the plan period to 2031.	No amendment in response to this issue
17.45	Policy TRA1	The Council should engage with train companies to ensure that housing is supported by improved services. Bus services also need to be improved and better walking and cycling routes provided. People will only reduce car usage if there are suitable public transport alternatives.	Discussions have taken place during the plan making process with the relevant bus companies, Train Operating Companies and Network Rail. These are ongoing and they will continue to have an opportunity to respond to emerging development proposals as work on the District Plan progresses. Policy TRA1 requires the provision of new and improved pedestrian and cycling routes in order to help deliver a modal shift away from car use in accordance with the NPPF.	No amendment in response to this issue
17.46	Policy TRA1	HCC have offered a number of comments identifying the type of mitigation measures that may be required for sites included within the draft District Plan.	Noted. The Council looks forward to continued co-operation with the County Council and other partners in order to in order to understand the potential impact of development on both the strategic and local highway networks, and any mitigation measures that may be required.	No amendment in response to this issue
17.47	Policy TRA1	Routes should be safeguarded for new east/west transport routes such as guided bus routes, light rail and cycle routes.	The limitations of existing east-west travel are acknowledged and this matter was raised in the Issues and Options consultation document; however, it is beyond the scope of this Plan to seek a solution to this long-standing issue.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
17.48	Policy TRA1	Sufficient parking provision should be made at new developments. If not, double yellow lines should be used to stop parking on the street.	At present, parking standards are contained within the adopted Vehicle Parking at New Development SPD. These standards will be reviewed as part of the ongoing work on the emerging District Plan. Parking enforcement lies outside of the scope of the District Plan.	No amendment in response to this issue
17.49	Policy TRA1	Providing better access to the countryside is supported. Many public rights of way are poorly maintained or are blocked.	Noted. A new section and policy regarding Public Rights of Way is to be inserted into Chapter 18 'Community Facilities, Leisure and Recreation'.	No amendment in response to this issue
Highway Safety and Trip Generation				
17.50	Policy TRA2	This policy is addressed to vehicle use and provision. There is no policy on overall networks and priority criteria, within new developments or more widely.	It is important to note that responsibility for wider route networks and development standards in relation to access etc lie with HCC as highway authority and reference to the Local Transport Plan and daughter documents, which contain the strategic framework, has been made in this chapter. The emerging District Plan does not seek to duplicate the role of that authority, so while Policy TRA2 sets out the general criteria by which any application would be considered, the more technical requirements attached to the Development Management process are beyond the scope of the District Plan.	No amendment in response to this issue
Vehicle Parking Provision				
17.51	17.4.1	If the amount of parking is restricted, it is essential that people don't park their cars on streets instead.	At present, parking standards are contained within the adopted Vehicle Parking at New Development SPD. These standards will be reviewed as part of the ongoing work on the	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
			<p>emerging District Plan. In the consideration of planning applications, the Council pays particular attention to ensuring that the impact that the level of parking provision associated with new development may have on a surrounding area, is appropriately mitigated.</p> <p>Parking enforcement lies outside of the scope of the District Plan but, where there is a specific identifiable concern, development proposals are able to include appropriate measures, e.g. Residents Parking Zones, which can influence motorists' parking choices.</p>	
17.52	Policy TRA3	Policy should include support for provision of adequate cycle storage for existing as well as new development.	Policy TRA3 Part II identifies a need to provide sufficient secure, covered and waterproof cycle storage facilities.	No amendment in response to this issue
17.53	Policy TRA3	Policy should include wording to prevent the loss of front gardens for the purpose of car parking which has a detrimental impact on the public realm.	While the issue is noted, the conversion of front gardens to provide additional parking provision is usually carried out under permitted development rights, as long as a porous material is used. It is therefore not possible for the District Plan to address this issue.	No amendment in response to this issue
17.54	Policy TRA3	Aston Parish Council considers that the Plan should include a policy concerning parking in residential areas. Any such policy should take account of the impact of new development in existing parking, for instance knocking down a garage block to build new houses.	At present, parking standards are contained within the adopted Vehicle Parking at New Development SPD. These standards will be reviewed as part of the ongoing work on the emerging District Plan.	No amendment in response to this issue
17.55	Policy TRA3	Buntingford Town Council, Bishop's Stortford Town Council, Buckland and Chipping Parish Council and other local bodies state that the Vehicle Parking SPD should be updated and should quote minimum standards not maximum. The SPD should recognise	At present, parking standards are contained within the adopted Vehicle Parking at New Development SPD. These standards will be reviewed as part of the ongoing work on the emerging District Plan.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
		that areas with poor public transport links have a higher reliance on the motor vehicle. The SPD should also have more of a focus on design in relation to garage sizes and parking courts.		

Other Proposed Amendments

Location/ Policy Paragraph Number	Issue	Proposed Amendment
Paragraph 17.1.3	HCC is currently in the process of updating its Transport Planning Framework. This comprises a review of the Urban Transport Plan (UTP) process, specifically the removal of the existing timetable for UTP review, and replacement with a more flexible UTP refresh process to allow updates to UTPs when appropriate. The introduction of Growth & Transport Plans is also planned for areas of economic growth. These changes necessitate the amendment of text.	Although the LTP identifies some specific schemes for implementation in the district, the majority of transport schemes are <u>have been</u> identified through a rolling programme of Urban Transport Plans (UTPs) which identify how and where the strategic objectives and targets detailed in the county-wide LTP can be delivered at a local level. There are two <u>is one adopted</u> UTPs affecting East Herts; the Hertford and Ware Urban Transport Plan (HCC, November 2010), and the emerging Bishop’s Stortford and Sawbridgeworth Urban Transport Plan, which will be refreshed as appropriate. <u>For areas where significant development is planned or anticipated, HCC is in the process of introducing Growth & Transport Plans, to ensure that appropriate transport infrastructure (including optimal packages of measures) is identified and also that they be used to help to inform future potential major transport scheme decisions.</u>
Section 17.3	Renaming of title considered necessary to better describe section contents.	Highway Safety and Trip Generation <u>Safe and Suitable Highway Access Arrangements and Mitigation</u>
Paragraph 17.3.1	To ensure that it is made explicit that the onus will be on developers to demonstrate that transport provision associated with development proposals are appropriate, further wording has been added to the end of the paragraph.	In designing new developments it is important that proposed access arrangements are both safe for users and suitable for the type of development and number of users proposed and trips predicted to be generated. Where additional trips are predicted from a site it is necessary to ensure that measures can commensurately mitigate the impact where possible. and <u>While</u> the NPPF is clear that “development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe” (Paragraph 32, NPPF, CLG, 2012), <u>developers should be able to demonstrate that transport provision associated with development proposals will be appropriate, both in terms of modal choice and the capacity of the highway network to accommodate additional trips.</u>
Policy TRA2	Renaming of title considered necessary to better describe policy contents.	Highway Safety and Trip Generation <u>Safe and Suitable Highway Access Arrangements and Mitigation</u>
Policy TRA2	Numbering inconsistency – two (b)’s.	Replace second (b) with (c).

18 Community Facilities, Leisure and Recreation

18.1 Introduction

18.1.1 In order for communities to be successful, it is vital that they are well served by a full range of services and infrastructure which are appropriate to people's needs and accessible to all.

18.1.2 Open space, sport and recreation facilities are important in enhancing people's quality of life. They also perform wider roles in helping to build inclusive communities, promoting healthy lifestyles and protecting green spaces. Similarly, community facilities play a significant role in developing the social wellbeing of individuals and communities by allowing activities and interests to grow outside of the home and the workplace. They also bring people together and help to establish new communities. Access to education is another key contributor to a sense of community and wellbeing.

18.1.3 The loss of open space, sport, recreation and community facilities which provide valuable public services could prove detrimental to community identity and sustainability. Safeguarding such facilities will help realise the full potential of existing buildings for community use and encourage re-use of appropriate buildings when they become available.

18.1.4 With an ageing population local access to healthcare facilities is an important part of everyday life, and the provision of such facilities within a community, accessible by a choice of sustainable travel options is vital. Facilities which assist in individuals maintaining a healthy and active old age will become more important in East Herts.

18.2 Open Space, Sport and Recreation

18.2.1 Regular physical exercise contributes to good levels of health and wellbeing. Aside from its benefits to the individual, increased participation in sport can also have wider benefits in tackling social exclusion and reducing anti-social behaviour. It is therefore important that people in all areas

have access to good quality open spaces and the opportunity to participate in formal and informal recreation, including waterside and water based recreation. Open spaces often have multiple uses: those designated for outdoor recreation such as golf courses, public parks and allotments also form part of the wider green infrastructure network.

18.2.2 A high proportion of adults and children do not exercise regularly. Increasing participation rates in sport and recreation requires the co-ordinated efforts of many partner organisations. Open spaces and sports facilities are key community facilities which contribute towards health and wellbeing both directly and indirectly. Planning's role involves protecting existing assets, and promoting provision through the planning process by making sure that new development does not result in a shortfall in the provision of facilities. Planning also has a role in promoting the provision and enhancement of new and existing facilities through a positive policy approach towards such development, and where necessary through site allocation.

18.2.3 Sport England is the Government agency which seeks to encourage people and communities to participate in active sport and recreation. It aims to ensure positive planning for sport, enabling the right facilities to be provided in the right places, based on robust and up-to-date assessments of need for all levels of sport and all sectors of the community. Sport England, working with the provisions of the NPPF, encourage local planning authorities to make direct reference to sport in local planning policy to protect, enhance and provide sports facilities, as well as helping to realise the wider benefits that participation in sport can bring. As such, Sport England has a role in protecting sports provision and is consulted where planning applications impact on such facilities. All proposals for new facilities will be expected to be designed in accordance with Sport England's design guidance to help ensure that facilities are fit for purpose and of a high quality design.

- 18.2.4 The council has recently undertaken a number of technical studies that seek to inform the preparation of the District Plan, in accordance with the requirements of the NPPF. The Playing Pitch Strategy (2010), which was part of a wider Sports Facility Assessment (2011) identifies locations where there is a deficit of provision in particular sports and the need for new facilities. Applications will be expected to refer to these studies as appropriate. Given there are existing deficits in provision, the loss of facilities should only occur in tandem with their replacement by new and enhanced facilities, which will be required to be delivered prior to the commencement of development in order to ensure that replacement facilities are available to provide continuity for users.

The East Herts Playing Pitch Strategy can be viewed and downloaded from the Council's Website at:

www.eastherts.gov.uk/playingpitchstrategy

The East Herts Sports Facility Assessment can be viewed and downloaded from the Council's Website at:

www.eastherts.gov.uk/indoorsportsfacilityassessment

- 18.2.5 Community Use Agreements will be sought to secure community use of new facilities provided on sites which may not usually be available for wider community access (e.g. educational or private sites).

Policy CFLR1 Open Space, Sport and Recreation

I. Proposals that result in the loss or reduction of open space, indoor or outdoor sport and recreation facilities, including playing fields, (as defined on the Policies Map) will be refused unless:

- (a) An assessment has been undertaken which has clearly shown that the facility is no longer needed in its current form; or
- (b) The loss resulting from the proposed development would be replaced by enhanced provision in terms of quantity and/or quality in a suitable location prior to the commencement of development; or

(c) The development is for an alternative open space, sport and recreation facility, the need for which clearly outweighs the loss.

II. Proposals that retain or enhance the provision, quality and accessibility of existing open space, or indoor or outdoor sport and recreation facilities will be supported in principle, where they do not conflict with other policies within this Plan.

III. Proposals for new open space, indoor and outdoor sport and recreation facilities which meet identified needs will be encouraged in suitable locations, served by a choice of sustainable travel options. The proposal and all ancillary facilities such as changing rooms and car parking should be fit for purpose and of an appropriate scale and design. Measures should be taken to integrate such facilities into the landscape providing net benefits to biodiversity.

IV. Proposals should aim to provide for the dual or multiple use of facilities for wider community activities. The use of Community Use Agreements will be expected where appropriate.

18.3 Open Space Standards

18.3.1 New housing can place additional pressure on existing open space and other sport and recreation facilities unless increased provision of such facilities is an integral part of the development. New residential proposals will therefore be expected to provide on-site areas of open space/facilities where appropriate.

18.3.2 It is recognised, however, that in certain circumstances on-site provision may not be the best planning solution to meet the community's requirements for additional open space/facilities. In these circumstances, developers will be expected to provide financial contributions towards off-site provision in lieu of providing open space/facilities on site.

18.3.3 Individual requirements will be assessed on a site by site basis and will be informed by the Council's Sports Facility Assessment (2011), Playing Pitch Strategy (2010) and 'Open Space, Sport and Recreation' Supplementary Planning Document (2009, or as amended). These standards are

detailed in Appendix C. Sport England has also published a series of guidance notes on matters such as the design of sports facilities and planning activity into developments. Where these approaches supersede locally set standards, they will be used.

The East Herts Open Space, Sport and Recreation Supplementary Planning Document (2009, or as amended) can be viewed and downloaded at: www.eastherts.gov.uk/openspacespd

The Sport England guidance note on the Design of Sports Facilities can be viewed and downloaded from the Sport England Website at: www.sportengland.org/facilities-planning/tools-guidance

The Sport England guidance note on Planning Activity into Developments can be viewed and downloaded from the Sport England Website at: www.sportengland.org/facilities-planning/planning-for-sport/

Policy CFLR2 Open Space and Sports Facilities Standards

I. The provision of adequate and appropriately located open space, sport and recreation facilities in conjunction with new residential development will be sought in accordance with the standards set out in Appendix C of this Plan, or any subsequent SPD identifying priorities in local needs.

II. Developers will be expected to provide either on-site provision, or where appropriate, a financial contribution towards either off-site provision, or the enhancement of existing off-site facilities. Where provision is made on-site as part of a development, applicants should detail how it will be maintained in the long term.

18.4 Local Green Space

18.4.1 The NPPF has introduced a new policy allowing local communities to identify green areas of particular importance to them for special protection. By designating land as 'Local Green Space' local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with sustainable development and complement

investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. Recognising the amenity, wildlife and leisure value of the 'green fingers' in Hertford and Bishop's Stortford, the Council has designated these areas as Local Green Spaces. Local communities, through Neighbourhood Plans, can also identify green areas of particular importance to them for special protection.

Policy CFLR3 Local Green Space

Development will not be allowed within Local Green Spaces, as defined on the Policies Map, other than in very special circumstances.

18.5 Public Rights of Way

18.5.1 Rights of Way are footpaths, bridleways and byways which have public access. Hertfordshire has an extensive Rights of Way network of over 5,200 paths totalling more than 3,000km. These paths are shown on a map and have a written description in a legal record called the Definitive Map and Statement, which is looked after by Hertfordshire County Council's Rights of Way Service at County Hall, Hertford.

Further information on the County Council's Rights of Way Service can be viewed [here](http://www.hertsdirect.org/services/envplan/countrysideaccess/row/):

<http://www.hertsdirect.org/services/envplan/countrysideaccess/row/>

18.5.2 The Public Rights of Way network has always been an asset for recreation or for the purpose of everyday use such as getting to the local shop or to a bus stop for example. This valuable resource, often taken for granted, now plays an even more important role with regards to people's health and wellbeing and can contribute towards reducing carbon emissions by encouraging travel on foot or by bicycle rather than by car. Public Rights of Way also help to boost tourism and therefore contribute towards the local economy. Without them it would be difficult for residents and visitors alike to access the countryside we have in and around East Herts.

18.5.3 Development proposals should therefore take full account of the need to protect and enhance Public Rights of Way.

Policy CFLR4 Public Rights of Way

Proposals for development must not adversely affect any Public Right of Way and, where possible, should incorporate measures to maintain and enhance the Rights of Way network.

18.56 Water Based Recreation

18.56.1 The district's many rivers, canals, lakes and other enclosed water areas such as former quarries and gravel pits offer many opportunities for recreation such as angling and boating as well as walking and cycling. Contributing to the character of the towns through which they flow, notably Bishop's Stortford, Hertford, Ware and Sawbridgeworth, these waterways are also primary habitats for vulnerable species of flora and fauna and as such it is necessary to ensure that recreational activities do not harm the very habitats that make them attractive to visitors.

18.6.2 Any proposals for development needed to support water based recreation which might increase the recreational use of a stretch of waterway should be considered in conjunction with the Canal & River Trust as Navigation Authority to ensure there is no detrimental impact on other recreational users of the waterway or towpath.

Policy ~~CFLR4~~ CFLR5 Water Based Recreation

Proposals for water-based recreation will be supported in principle, where:

(a) The proposal does not have a significant adverse impact on the nature conservation interest, the character, or appearance of the environment;

(b) The proposal does not conflict with the relevant River Catchment Management Plan; and

(c) The proposal does not have an adverse impact on any flood alleviation works and does not impede the Environment Agency's access requirements to waterworks.

18.6~~7~~ The Lee Valley Regional Park

18.6~~7~~.1 The Lee Valley Regional Park is an important component of the district's green infrastructure defined by its openness, attractive and heritage rich landscapes, sites of nationally significant biodiversity and varied visitor attractions. The Park also has an important role to play in mitigating the impacts of climate change, managing increased flood risk, conserving and enhancing scarce resources (in particular water resources), offsetting urban heat island effects and meeting the open space needs of a growing population.

18.6~~7~~.2 The Regional Park is statutorily designated for leisure, recreation, sport and nature conservation. It covers an area of 4,000 hectares and stretches for 26 miles along the River Lea from the River Thames in East London to Ware in Hertfordshire. Established by Parliament in 1967 the Regional Park was created to meet the recreation, leisure and nature conservation needs of London, Hertfordshire and Essex.

18.6~~7~~.3 Approximately 440 hectares of the Park lie within East Herts, with 98.69% of it designated as Green Belt. This is an area of predominantly high quality landscape with a rural and unspoilt character and features of heritage significance. Gravel extraction has created a number of water areas, providing opportunities for angling, sailing and the creation of important wetland habitats which contribute to the intimate and semi-enclosed landscape character of the area. The landscape both within and beyond the Park boundaries provides a setting for every event and activity within the Park making a key contribution to the quality of the visitor experience.

18.6~~7~~.4 Key sites of nature conservation interest within the Park include two Sites of Special Scientific Interest (SSSIs) at

Amwell and Rye Meads Local Nature Reserves which form part of the Lee Valley Special Protection Area (SPA) and Ramsar site. Existing and new connections with adjoining green infrastructure networks (e.g. to the west with Wormley/Hoddesdonpark Woods, to the north with Kings Meads and to the east along the Stort Valley) are to be enhanced, protected and promoted. Further information on the Council's approach to nature conservation and green infrastructure can be found in Chapter 19: Natural Environment.

18.67.5 The Regional Park Authority Plan guides development and the use of the waterways within the Regional Park. The current Lee Valley Regional Park Development Framework was adopted in July 2010, with Thematic Proposals adopted in January 2011, and consists of two parts:

- Part one: outlines the policies and objectives for the regional park, providing the strategic policy framework for its future use and development.
- Part two: consists of particular proposals for the future use and development of individual sites and areas that collectively form the totality of the regional park.

18.67.6 Current proposals in the Park Development Framework which relate to East Herts include:

- Improvements to the range of visitor facilities available within the Park in East Herts, including new waterside picnic areas, an enhanced path network, café, cycle hire, water bus service and boat hire;
- Improvements to public realm, signage and routes at existing gateways into the Park and from Rye House, St Margarets and Ware stations;
- Protection of Amwell and Rye Meads SSSI's as internationally important wetland habitats and support for measures that enhance opportunities to enjoy, study and get close to nature;

- Options, to be explored with the Herts & Middlesex Wildlife Trust and the Canals & Rivers Trust, to incorporate and open up the Tumbling Bay area as part of the Amwell Nature Reserve;
- Enhancement of existing sailing and angling facilities;
- Increased recreational use of the waterways, including provision of additional recreational moorings;
- Protection and continued enhancement of the positive landscape character and its heritage value.

Full details of the Park Development Framework and Area Proposals can be found at: www.leevalleypark.org.uk/parkframework/home/

18.67.7 The District Council will support and work with the Regional Park Authority and other stakeholders to deliver the Park Plan 2000 and the Park Development Framework Area Proposals where these improve leisure and sporting opportunities for local communities, enhance access to open space and nature, and help expand educational, volunteering and health related activities.

Policy ~~CFLR5~~ CFLR6 The Lee Valley Regional Park

I. The District Council supports the Lee Valley Regional Park Development Framework, which will be treated as a material consideration in the determination of planning applications in this area.

II. Proposals for leisure related developments within the Lee Valley Regional Park will be supported in principle provided that intensive land-use leisure activities and associated buildings are located as unobtrusively as possible near existing settlements and do not conflict with other policies within this Plan.

18.78 Equine Development

18.78.1 Equestrian related activities are popular forms of recreation and economic development in the countryside. These uses, including riding schools and stables, can fit in well with agricultural activities and help to diversify the rural economy.

The Council will support equine development that maintains environmental quality and the character of the countryside.

18.78.2 While equestrian development can be appropriate in the open countryside, the cumulative impact of horse related activities and associated buildings can have an adverse impact on the character and appearance of rural areas. Existing buildings should, wherever possible, be re-used. New buildings for horse related activities, including stables, field shelters and tack rooms should be no larger than is essential. In most cases isolated development is unlikely to be acceptable.

18.78.3 All equestrian development, whether domestic or commercial, should be of an appropriate scale and design and careful attention should be given to siting, materials and landscaping to avoid an adverse impact on the countryside. Particular care will be needed where floodlighting is proposed in order to avoid an unacceptable impact on residential amenity. In assessing any application, regard will be had to the British Horse Society standards for grazing. Where commercial development is proposed in the Green Belt, the requirement to demonstrate 'very special circumstances' in accordance with Policy GBR1 will apply.

Policy ~~CFLR6~~ CFLR7 Equine Development

I. Proposals for small-scale equine development (up to 10 stables), whether domestic or commercial, will be permitted when the following criteria are met:

(a) ~~The proposal is not sited in a prominent location~~ The proposal is sited or landscaped to minimise visual intrusion;

(b) Where new buildings are proposed, applicants must demonstrate that existing structures cannot be re-used;

(c) The siting, scale and design of the proposal is in keeping with the character of the area, with adequate pasture to support horses. Particular regard will be had to the cumulative effect of proposals on local landscape or biodiversity interests;

(d) The amenity of nearby residential properties is not adversely affected, for example, in relation to floodlighting, noise and disturbance;

(e) The proposal would not (by itself or cumulatively) have a significant adverse impact in terms of traffic generation;

(f) The proposal does not result in harm to the ecological network, including partial or complete loss or degradation of Local Wildlife Sites or priority habitats;

(g) The proposal does not conflict with other policies within this Plan.

II. Where commercial development is proposed in the Green Belt, the requirement to demonstrate 'very special circumstances' in accordance with Policy GBR1 will apply.

18.8-9 Community Facilities

18.8-9.1 Community facilities provide for the health and wellbeing, social, educational, recreational, leisure and cultural needs of the community. Community facilities include, but are not limited to: art galleries; cinemas; community centres; crèches/nurseries; healthcare facilities; museums and libraries; music and concert halls; places of worship; schools; post offices; public houses; village halls; local/village shops. Such facilities act as the focus of community activity and contribute towards community cohesion. Community facilities are provided by a wide variety of agencies including local authorities, other public service providers, churches and the voluntary and business sectors.

18.8-9.2 Urban and rural communities require access to core community facilities. The requirement for facilities is evolving in response to changes in the needs of the local population. As the proportion of people over 65 increases, so demand for facilities catering for older people will rise. New facilities and services including crematoria and burial space may be needed, particularly where a significant amount of new housing is proposed.

18.8-9.3 Planning can help co-ordinate the provision of new facilities and new housing development, and obtain appropriate

developer contributions. It can also resist the loss of existing facilities. The District Council will require that proposals for change of use are supported by evidence that the particular facility is no longer viable and explain the options that have been investigated to maintain the service. As new developments require good access to facilities and create additional demand for existing facilities, so any shortfall in provision arising as a result of new development, must be addressed as part of the development.

18.89.4 Within villages and the rural area, community facilities are vital to residents, often providing a lifeline for those unable to get into town on a regular basis. The loss of local village shops, post-offices and pubs can be a substantial loss to the local community.

18.89.5 Under the Localism Act, voluntary and community organisations can nominate an asset to be included on a list of 'assets of community value'. This list is managed by the Council. If a landowner wants to sell a registered property, they must tell the Council. If a group wants to buy the asset, they can trigger a six month moratorium to give them a chance to raise the money but the landowner can still sell at the going market rate. This period gives community groups some time to develop a proposal and raise the required capital to bid for the property when it comes onto the open market at the end of the moratorium period, thus retaining a valued facility for community use.

More information on Assets of Community Value can be found on the Council's Website at: www.eastherts.gov.uk/communityassets

18.89.6 Village halls also play a valuable role within rural communities, accommodating a variety of uses such as crèches, youth clubs, doctor's surgeries, as well as providing a venue for social events. New facilities can be designed to accommodate both indoor and outdoor sporting activities, and even small scale business hubs, further boosting the viability of the facility to all age groups and users.

18.89.7 Facilities used for the practice of faith or culture are important buildings within communities and offer the opportunity to bring people together through the sharing of space and facilities.

18.9.8 Public houses play an important role in local communities, providing a social venue, local employment opportunities and adding to the vitality of a village.

18.89.98 In circumstances where minor extensions or alterations to existing premises are essential to the continued viability of the business and the vitality of the village then these may be permitted in accordance with Policy CFLR7 below.

Policy CFLR7 CFLR8 Community Facilities

~~I. Proposals that result in the loss of uses, buildings or land for public or community use will be refused unless:~~

~~(a) An assessment has been undertaken which has clearly shown that the facility is no longer needed in its current form; or~~

~~(b) The loss resulting from the proposed development would be replaced by enhanced provision in terms of quantity and/or quality in a suitable location; or~~

~~(c) The development is for an alternative community facility, the need for which clearly outweigh the loss.~~

I. The provision of adequate and appropriately located community facilities will be sought in conjunction with new development.

II. Developers will be expected to provide either on-site provision, or where appropriate, a financial contribution towards either off-site provision, or the enhancement of existing off-site facilities. Where provision is made on-site as part of a development, applicants should detail how it will be maintained in the long term.

~~II. Proposals that retain or enhance the provision, quality and accessibility of existing uses, buildings or land for public or community use will be supported in principle, where they do not conflict with other policies within this Plan.~~

III. Proposals for new and enhanced uses, buildings or land for public or community use will be supported in principle where they do not conflict with other policies within this Plan. Such proposals:

(a) Should be in suitable locations, served by a choice of sustainable travel options;

(b) Should be of an appropriate scale to meet needs and be of a flexible design to enable multiple uses throughout the day;

(c) Should take measures to integrate such facilities into the landscape providing net benefits to biodiversity; and

(d) Should be constructed in tandem with the development to ensure they are available for the new and existing community from the start of occupation.

IV. Proposals should aim to provide for the dual or multiple use of facilities for wider community activities. The use of Community Use Agreements will be sought where appropriate.

V. Limited extensions/alterations to existing community facilities in the Green Belt and Rural Area Beyond the Green Belt may be supported in principle, where they do not conflict with other policies within this Plan.

Policy CFLR9 Loss of Community Facilities

I. Proposals that result in the loss of uses, buildings or land for public or community use will be refused unless:

(a) An assessment has been undertaken which has clearly shown that the facility is no longer needed in its current form; or

(b) The loss resulting from the proposed development would be replaced by enhanced provision in terms of quantity and/or quality in a suitable location; or

(c) The development is for an alternative community facility, the need for which clearly outweigh the loss.

18.9~~9~~10 Health and Wellbeing

18.9~~9~~10.1 The NPPF requires planners to consider health in a range of different ways. The framework's presumption in favour of sustainable development highlights the importance of achieving social, economic and environmental objectives (health encompasses all three). Recent changes to the way healthcare is managed in the UK and in Hertfordshire are creating new opportunities to create closer links between healthcare and planning systems. The Joint Strategic Needs Assessment (2008) undertaken by the Hertfordshire Health and Wellbeing Board and the Clinical Care Commissioning Groups (CCG) provided useful baseline information from which to plan for the future of healthcare provision in the district. This has been updated by Health Summaries (2013) produced by Clinical Care Commissioning Groups; East Herts is joined with North Herts under the NHS East and North Hertfordshire Clinical Commissioning Group. Public Health England also records a wealth of data on health and wellbeing in the form of Local Health Profiles. East Herts Council has produced a Draft Health and Wellbeing Strategy (currently at consultation stage).

The Health Summary for the East and North Hertfordshire Clinical Commissioning Group area can be viewed and downloaded from the NHS East and North Hertfordshire CCG Website at: www.enhertsccg.nhs.uk/

Local Health Profiles can be viewed on the Public Health England Website at: www.apho.org.uk/

The East Herts Draft Health and Wellbeing Strategy can be viewed and downloaded from the Council's Website at: www.eastherts.gov.uk

18.9~~9~~10.2 The planning system can play an important role in creating healthy, inclusive communities. This could include, for example, measures aimed at reducing health inequalities, encouraging physical activity, improving mental health and wellbeing, and improving air quality to reduce the incidence

of respiratory disease. Sport England provides advice on designing developments to encourage physical activity.

The Sport England guidance note on Planning Activity into Developments can be viewed and downloaded at: www.sportengland.org/facilities-planning/planning-for-sport/

The Sport England guidance note on Active Design provides a set of design guidelines to promote opportunities for sport and physical activity in the design and layout of development and can be viewed here: <http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/>

Policy CFLR8 CFLR10 Health and Wellbeing

I. All development shall be designed to maximise the impact it can make to promoting healthy communities and reducing health inequalities. In particular, regard shall be had to providing the necessary infrastructure to encourage physical exercise and health, including accessible open space, vegetation and landscaping, sport and recreation facilities and safe, well promoted, walking and cycling routes.

II. Where new health facilities are planned, these should be located where there is a choice of sustainable travel options and should be accessible to all members of the community.

III Contributions towards new or enhanced health facilities will be sought where new housing results in a shortfall or worsening of provision.

IV. Where new facilities for community use, including for the practice of faith, are planned, these should be of a flexible design to enable multiple uses throughout the day and should be located where there is a choice of sustainable travel options.

18.40 11 Education

18.40 11.1 Access to education is a key contributor to a sense of community and wellbeing. Often schools are the focus of a community, particularly where early years education, extra-curricular activities or public access to facilities are offered.

Educational attainment is the keystone of any economy and it is important that access to such facilities is available to the very young through to adult learning opportunities. Ensuring that sufficient school places are available to support development is an integral part of delivering sustainable communities.

18.4011.2 The Government is committed to ensuring that there is sufficient provision to meet growing demand for school places, through increasing choice and opportunity in state funded education. This commitment is reflected in the NPPF. Local authorities are required to give full and thorough consideration to the importance of enabling development of state-funded schools in their planning decisions.

18.4011.3 Hertfordshire has experienced a significant rise in the demand for school places across the County in recent years in line with the picture nationally. Hertfordshire County Council (HCC) has a statutory duty to ensure sufficient school places within its area. However, HCC does not control the admissions or management of many schools across the County. As the district's population grows demand for school places will continue to increase, placing pressure on existing facilities. It is therefore vital that where housing growth results in increased demand this should provide for investment is made across each education tier to ensure there are enough places to serve the district's pupils within their community.

18.11.4 To ensure the best outcome for school provision, applicants should work with HCC, the District Council and other neighbouring local authorities with a duty for ensuring that there are sufficient school places available to serve new housing developments, to ensure appropriate facilities are provided.

Policy CFLR9 CFLR11 Education

I. Development that creates a potential increase in demand for education will be required to make appropriate provision for facilities either on-site or by making a suitable contribution towards the improvement or expansion of nearby existing facilities. Applicants will be expected to work in partnership with Hertfordshire County Council and other neighbouring local authorities with a duty for ensuring that there are sufficient school places available to serve new housing developments, to ensure appropriate facilities are provided.

II. Proposals which fail to make appropriate provision for the education of its future residents will be refused.

III. Proposals for the creation of new or extended education facilities for all ages should:

(a) Be in an accessible location~~suitably located~~, served by a choice of sustainable travel options;

(b) Be of the highest quality of design which offers flexible use of facilities, in order to ensure the various needs of the community can be met, in accordance with Policy DES1 (Local Character and Amenity) (see also Policy ED6 (Lifelong Learning));

(c) Provide or retain a suitable provision of outdoor recreation space and playing fields, in accordance with Policy CFLR1 (Open Space, Sport and Recreation); and

(d) Be designed to facilitate the community use of facilities, in accordance with Policy CFLR7 (Community Facilities) and CFLR1 (IV) (Open Space, Sport and Recreation).

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Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
Introduction				
18.0	18	Provision must be carefully considered to ensure all age groups are catered for. Many services are being cut in the name of austerity. Skills and recreational training must be included.	Noted.	No amendment in response to this issue
18.1	18.1	Where is the chapter on Education?	Whilst there is no specific chapter, policies on education can be found under Section 18.10 (renumbered 18.11) and 14.6 Lifelong Learning.	No amendment in response to this issue
18.2	18.1.2	Paragraph supported.	Support noted and welcomed.	No amendment in response to this issue
18.3	18.1.3	What provision are EHDC envisaging for the increased number of young people in the area? Only one swimming pool and the number of football pitches is not enough for the present population.	It is acknowledged that new housing can place additional pressure on existing open space and facilities. New housing will therefore be expected to provide for new open space and facilities in accordance with Policy CFLR2. Proposals for new open space, indoor and outdoor sport and recreation facilities which meet identified needs will also be encouraged in suitable locations in accordance with Policy CFLR1.	No amendment in response to this issue
18.4	18.1.4	HERT4 – Bengo does not have any medical services, residents have to travel into town to visit the doctors or dentists. The extra 150 properties proposed by EHDC will place undue strain on the existing medical facilities. Extra capacity needs to be provided as and not after each phase is occupied. The larger sites to the west of Hertford would offer the chance to build these from scratch.	Noted – This comment will be considered further under Chapter 7: Hertford. Draft Policy CFLR7 could go further by encouraging the provision of community facilities in line with the demands of development. Policy CFLR7 (renumbered CFLR8) to be split into two with one policy that focuses on where new facilities are required and provided, and a second policy	Amendment to Policy CFLR7 (renumbered CFLR8) See proposed chapter

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
			which focuses on the loss of community facilities, in a similar way to the proposed changes to the open space policies.	
Open Space, Sport and Recreation				
18.5	18.2.4	Sport England support reference to technical studies underpinning CFLR1. Whilst studies are considered robust, the supply and demand data on which they are based is now 4-5 years old and there is a need to consider updating these. It will be important that a review of the studies is completed before the plan reaches an advanced stage.	Noted. The Council will continue to work with partners to ensure information is up-to-date and relevant throughout the plan period.	No amendment in response to this issue
18.6	18.2.5	Sport England welcome the proposed use of community use agreements to secure access to new facilities on educational/private sites. Approach accords with the NPPF which encourages the provision and use of shared space to enhance the sustainability of communities.	Support noted and welcomed.	No amendment in response to this issue
18.7	18.2.5	Local residents see the community use agreements as an opportunity for greater community use of the facilities at St Andrews School, Stanstead Abbots.	When appropriate opportunities arise, the Council will support and work with communities to make better use of facilities through Community Use Agreements.	No amendment in response to this issue
18.8	CFLR1 18.6	Natural England generally approves of the policies related to Open Space and is encouraged to see the protection and enhancement of the Amwell and Rye Meads SSI. The intention to maintain and create networks between Wormley/Hoddesdon Park Woods, Kings Mead and the Stort Valley is also welcomed.	Support noted and welcomed.	No amendment in response to this issue
18.9	CFLR1	Sport England support this as it is considered to provide a positive response to the evidence base for sport in relation to the protection, enhancement and provision of sports facilities. Policy fully accords with	Support noted and welcomed.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
		the NPPF especially paragraphs 70, 73 and 74.		
18.10	CFLR1	Walking in the area is an important recreational activity. There should be a statement that says: 'a strategic objective is to maintain the quality of the footpaths in the area, and the rural views that so many of them offer. Developments that will damage the views from footpaths will only occur where exceptional need can be shown, and where no other alternative exists.'	Whilst Policy TRA1 seeks to protect rights of way, it is considered appropriate to add a new section on public rights of way.	New Section 18.5 on Public Rights of Way See proposed chapter
18.11	CFLR1	Objection to the 'open space' designation on the land west of County Hall and should be removed from the proposals map. The playing pitches are unallocated in the adopted Local Plan. Land is used primarily by County Staff. Identification under Policy CFLR1 removes any possibility of potential residential uses on this site, for example on the part adjacent to Leahoe. Facilities for recreation acceptable within Green Belt policy could be provided on a site to the west of the town, north or south of Welwyn Road.	Not agreed. The land in question is allocated under Policy LRC1 in the Local Plan 2007. It is a well-used for cricket, football etc. by the County Council and other local clubs.	No amendment in response to this issue
18.12	CFLR1	There are not adequate sports facilities allocated in the Local Plan to accommodate for the level of growth.	It is acknowledged that new housing can place additional pressure on existing open space and facilities. New housing will therefore be expected to provide for new open space and facilities in accordance with Policy CFLR2. Proposals for new open space, indoor and outdoor sport and recreation facilities which meet identified needs will also be encouraged in suitable locations in accordance with Policy CFLR1.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
18.13	CFLR1	Bishop's Stortford College object to land in their ownership being identified under Policy CFLR1. Paragraphs 18.1.3 and 18.2.2. clearly highlight that the open space to which this policy should apply should comprise sports facilities or public recreation areas, not private garden/lawned areas. There is no public access through the College in this location. The CFLR designation should be removed.	Agreed.	Amendment to Policies Map
8.14	CFLR1 I (b)	<p>HCC object to CRLR1 I(b)</p> <p>Often when additional development is provided on a school site, the only area available is on an existing hard play area or playing field. When this occurs HCC provide mitigation for this loss. This mitigation may take a number of forms and can include, for example, the provision of a Multi-Use Games Area (MUGA); improvements to remaining sport pitches; or the use of a detached playing field.</p> <p>HCC work with Sport England to ensure that they raise no objections to any proposals for school expansions. Indeed, community use agreements have been required by Sport England, which has resulted in new and existing facilities on school sites becoming accessible to the local community outside of school hours.</p> <p>It is rarely possible to provide enhanced provision in terms of quantity but as stated above HCC seek to provide enhanced quality of facilities and access to those facilities for the local community. CFLR1 I(b) should be amended to read 'quantity and/or quality' rather than referring to both.</p>	Agreed.	<p>Amendment to Policy CFLR1</p> <p>I(b) The loss resulting from the proposed development would be replaced by enhanced provision in terms of quantity and/or quality in a suitable location prior to the commencement of development; or</p>

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
18.15	CFLR1	French & Jupps object to land in their ownership being identified under Policy CFLR1. Site originally identified in the 2007 Plan having been identified by the Parish Council as being 'ideal for outdoor activities associated with the adjacent hall'. At the time owners objected to the designation and continue to do so. The site is in private ownership, with no public access and is fenced. The site is not available for community leisure use.	If the land is identified as being in public use then it should be retained as CFLR designation. This site will be assessed as part of the SLAA process where this status will be confirmed.	Possible amendment to the Policies Map
18.16	CFLR1 I (b)	HCC further objects to the requirement that enhanced provision is provided <i>prior to the commencement of development</i> . With the expansion of a school this is not usually practical or possible. It should also be noted that some works required to playing fields, such as reseeding, can only take place at certain times of the year. As a result these improvements may take place several months after the completion of the built development on a school site.	Noted. However, as a general principle the Council would wish to see a continuation of provision. If there are particular circumstances that prevent this, these will be considered on a case by case basis.	No amendment in response to this issue
18.17	CFLR1 III	HCC support CFLR1 (III). However there is a concern that there is often a net degrading impact to biodiversity, often as a result of inappropriate management, disturbance and floodlighting. Whilst enabling increased use of facilities, this cannot have anything other than an imposing effect locally increasing the extent of artificial light, however well designed. Greater recognition of landscaping schemes to compensate for this and obscure any such negative impacts should be taken more seriously by LPAs than at present if this aim is to be met.	Noted.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
Open Space Standards				
18.18	CFLR2	Sport England generally supports this policy although raise concerns about the use of the standards set out in Appendix C in relation to outdoor and indoor sport. The standards referenced are considered to be out of date.	Comments noted. The Council is currently considering undertaking a review of standards. However, until such time as this has been completed the standards in Appendix C will be updated to reflect the Council's Sports Facility Assessment (2011) and the Playing Pitch Strategy (2010).	Amendment to Appendix C
18.19	CFLR2	Objection to the on-site open space requirements. Standards are considered too onerous and if adopted could frustrate future housing development in the district.	Comments noted. The Council is currently considering undertaking a review of standards. However, until such time as this has been completed the standards in Appendix C will be updated to reflect the Council's Sports Facility Assessment (2011) and the Playing Pitch Strategy (2010). This is in line with Sport England advice.	Amendment to Appendix C
Local Green Space				
18.20	CFLR3	Bishop's Stortford College object to land in their ownership being identified as 'Local Green Space'. The draft plan considers that this part of the land falls within a 'green finger'. Para 77 of the NPPF provides detailed guidance concerning the designation of new Local Green Space. The land in question is already Green Belt and there is no justification for additional protection. CFLR3 is not consistent with Green Belt policy.	Policy CFLR3 is considered to be in conformity with NPPF paragraph 77 on Local Green Space and Section 9 of the NPPF on Green Belt. The green wedges in Bishop's Stortford are of significant local importance in amenity wildlife and leisure value terms. It is considered appropriate given their local importance that the green wedges receive additional protection from inappropriate development.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
18.21	CFLR3	The Sacombe Road playing field should be designated in the Plan as a Local Green Space as it appears to meet the conditions but is not yet protected. Its possible use for housing is a matter of considerable local concern and speculation. It is the only safe green space for a considerable area of Bengo and is very heavily used throughout the day.	<p>The play area is already protected under Policy CFLR1 (Open Space, Sport and Recreation).</p> <p>The Council is not proposing to identify any further areas of Local Green Space in the District Plan. Local communities, however, through Neighbourhood Plans, can identify areas of particular importance to them for Local Green Space protection.</p>	No amendment in response to this issue
18.22	CFLR3	Bishop's Stortford North Consortium object to the Local Green Space designation on land within the Green Belt as there is no additional policy benefit. It is proposed that CFLR3 should be amended to include the same matters as in GBR1 and CFLR2 which allows for the erection of buildings and appropriate facilities associated with outdoor sports and recreation uses. The Local Green Space designation is seen to threaten the ability of the BSN Consortium to support the Local Sports Strategy to fund improvements to the sporting facilities within the town, including at Cricketfield Lane. There is a concern that there is some uncertainty around the ability to improve facilities without knowing whether 'very special circumstances' as these improvements may involve some form of development.	Policy CFLR3 is considered to be in conformity with NPPF paragraph 77 on Local Green Space and Section 9 of the NPPF on Green Belt. The green wedges in Bishop's Stortford are of significant local importance in amenity wildlife and leisure value terms. It is considered appropriate given their local importance that the green wedges receive additional protection from inappropriate development. This does not prejudice the ability to make improvements to existing facilities provided there is no impact on the purposes of the Green Belt.	No amendment in response to this issue
Water Based Recreation				
18.23	18.5.1	The Canal & River Trust support and encourage the use of waterspace and towpath for both informal and formal recreational use. However most of the recreational usage does not require the benefit of planning permission, rather it is the associated facilities, such as canoe stores and boathouses,	Comments noted. New paragraph added.	New paragraph 18.6.2 <u>Any proposals for development needed to support water based recreation which might increase the recreational use of a stretch of</u>

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
		<p>which are controlled by the need for planning permission. This section and policy does not make this clear.</p> <p>It is assumed that land based support facilities will be governed by other relevant plan policies, for example the same principles of good design will be expected for a boatclub clubhouse as for other buildings.</p> <p>The Trust therefore suggest that the council should consider the development needed to support waterbased recreation here, or at least make it clear that other policies will be applicable when such development is required.</p> <p>Any proposals for such development, which might increase the recreational use of a stretch of waterway should be considered in conjunction with the Canal & River Trust as Navigation Authority to ensure there is no detrimental impact on other recreational users of the waterway or towpath.</p>		<u>waterway should be considered in conjunction with the Canal & River Trust as Navigation Authority to ensure there is no detrimental impact on other recreational users of the waterway or towpath.</u>
18.24	CFLR4	HCC support the aim to support proposals for water-based recreation, as long as a proposal does not have a significant impact on biodiversity or character of the environment, or conflict with the River Catchment Management Plans.	Support and comments noted and welcomed.	No amendment in response to this issue
18.25	CFLR4	The Environment Agency supports this policy.	Support noted and welcomed.	No amendment in response to this issue
18.26	CFLR4	The Lee Valley Regional Park Authority supports this policy which seeks to protect the water environment and its ecological value as it will assist in protecting the Park's environment and wildlife resource.	Support noted and welcomed.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
The Lee Valley Regional Park				
18.27	18.6.1	The Environment Agency supports this paragraph.	Support noted and welcomed.	No amendment in response to this issue
18.28	18.6.1	The Lee Valley Regional Park Authority supports this paragraph which highlights the green infrastructure role of the Park and its role in mitigating the impacts of climate change, including managing increasing flood risk.	Support noted and welcomed.	No amendment in response to this issue
18.29	18.6.4	The Lee Valley Regional Park Authority supports the reference in this paragraph to establishing new and enhancing existing connections with other green infrastructure in the District. This addresses matters raised at the Issues and Options stage.	Support noted and welcomed.	No amendment in response to this issue
18.30	18.6.4	HCC welcomes the protection and enhancement of Green Infrastructure network between Lee Valley National Park, Wormley and Hoddesdonpark Woods and Kings Mead. This will need to be managed to ensure increased disturbance does not result in degrading these links.	Support and comments noted and welcomed.	No amendment in response to this issue
18.31	18.6.6	Note: correct title is Canal & River Trust.	Agreed.	Amendment to paragraph 18.6.6 (renumbered 18.7.6) <ul style="list-style-type: none"> Options, to be explored with the Herts & Middlesex Wildlife Trust and the Canals & Rivers Trust.
18.32	18.6.7	Parish Councils such as Stanstead Abbots should be included as a stakeholder.	Noted.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
18.33	18.6.8	The Lee Valley Regional Park Authority endorses the summary of PDF Proposals included in paragraph 18.6.8. This summary may require alterations before submission as the Authority is intending to produce a draft of these proposals for consultation.	Support noted and welcomed. The Council will continue to work with relevant partners to ensure information is up-to-date.	No amendment in response to this issue
18.34	CFLR5	The Lee Valley Regional Park Authority supports and welcomes this policy. This ensures the District Plan provides policy support for the delivery of the Park Development Proposals and protection for the Park and its role as part of the District's green infrastructure.	Support noted and welcomed.	No amendment in response to this issue
Equine Development				
18.35	18.7.1 & 18.7.2	18.7.1 and 18.7.2 recognise the positive and negative contributions equine related activities can play within the countryside. Horse grazing can be beneficial for biodiversity as a grazing tool but can, due to lack of rotation or removal of animals, result in overgrazed and weedy pastures. As such Policy CFLR6 could include (c) '...proposals on local landscape or biodiversity interests'.	Agreed.	Amendment to Policy CFLR6 (renumbered CFLR7) (c) The siting, scale and design of the proposal is in keeping with the character of the area, with adequate pasture to support horses. Particular regard will be had to the cumulative effect of proposals <u>on local landscape or biodiversity interests.</u>
18.36	CFLR6	Herts and Middlesex Wildlife Trust has suggested that an additional criterion should be added requiring that development does not result in harm to the local ecological network, including partial or complete loss or degradation of Local Wildlife Sites or priority habitats. The Trust would also recommend a criterion requiring proposals to comply with other policies in the Plan	Agreed.	Amendment to Policy CFLR6 (renumbered CFLR7) <u>(f) The proposal does not result in harm to the ecological network, including partial or complete loss or degradation of Local Wildlife Sites or priority habitats;</u> <u>(g) The proposal does not conflict</u>

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
				<u>with other policies within this Plan.</u>
18.37	CFLR6 I (a)	The term 'prominent location' is not considered suitable wording. Proposed wording amendment for CLFR6 (a): 'The development is sited in an area where it will not be detrimental to the appearance of the surrounding countryside.'	Agreed that the meaning of 'prominent location' is unclear. Criterion (a) has been reworded to provide clarity.	Amendment to Policy CFLR6 (renumbered CFLR7) (a) The proposal is not sited in a prominent location <u>The proposal is sited or landscaped to minimise visual intrusion;</u>
18.38	CFLR6 (c)	Suggested additional wording: 'Particular regard will be had to the cumulative effect of proposals on local landscape or biodiversity interests.'	Agreed.	Amendment to Policy CFLR6 (renumbered CFLR7) (c) The siting, scale and design of the proposal is in keeping with the character of the area, with adequate pasture to support horses. Particular regard will be had to the cumulative effect of proposals <u>on local landscape or biodiversity interests.</u>
Community Facilities				
18.39	Section 18.8	The Plan does not make suitable provision for new places for religious worship. This should be included to assist religious groups seeking places for religious worship. Buntingford has been highlighted as an area where religious facilities are needed.	The Plan clearly recognises that places of worship are community facilities. As such Policy CFLR7 (renumbered CFLR8) and New Policy CFLR9 (Loss of Community Facilities) supports the diversity of faith communities by requiring the provision of adequate and appropriately located facilities in conjunction with new development, as well as protecting existing facilities. In addition Policy CFLR8 (IV) (renumbered	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
			CFLR 10) refers to new facilities for community use, 'including for the practice of faith'.	
18.40	Section 18.8	HCC comment that as a result of the proposed development in the District Plan, Services for Young People will look to enhance the existing resources for young people in Bishop's Stortford, Buntingford and Ware. The resource would be for the provision of youth work, information, advice and guidance.	Comments noted. The District Council will continue to work with relevant partners and providers to seek to ensure adequate youth service provision is provided as a result of future growth in the District.	No amendment in response to this issue
18.41	Section 18.8	HCC Children's Services and Children's Centres are often but not exclusively provided on school sites. Information provided on the current position and requirements arising from the proposed development for the provision of Early Years facilities.	Noted.	No amendment in response to this issue
18.42	18.8.3	Paragraph requires that 'any shortfall in provision' must be addressed 'as part of' new developments. This implies that existing infrastructure deficits are to be made up by new developments. If this is the case this is contrary to the legal tests within the Community Infrastructure Levy Regulations.	Comments noted and clarification provided.	Amendment to paragraph 18.8.3 (renumbered 18.9.3) As new developments require good access to facilities and create additional demand for existing facilities, so any shortfall in provision <u>arising as a result of new development</u> , must be addressed as part of the development.
18.43	CFLR7	Sport England supports (IV). Dual/multiple use of facilities is often an efficient and sustainable way of meeting local needs especially in rural areas such as East Herts. Approach accords with NPPF Paragraph 70 which encourages the provision and use of shared space.	Support noted and welcomed.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
18.44	CFLR7	McMullen & Sons Limited would like to see a District Plan that facilitates the long term viability of pubs, particularly those in rural areas. This would involve the presumption that they can be developed and expanded to a size sufficient to provide food on an economical scale with a kitchen, storage and car parking facility to match. This would redress much of the national legislation that seeks to inhibit the sale of pubs while doing nothing to enable their viability.	Comments noted. Additional wording is suggested to reflect the important role that public houses play in rural communities. Policy CFLR7 (renumbered CFLR8) already supports in principle minor extensions or alterations to existing premises which are essential to the continued viability of the business and the vitality of the village (where there is no conflict with other policies in the Plan).	New Paragraph 18.9.8 added <u>18.9.8 Public houses play an important role in rural communities, providing a social venue, local employment opportunities and adding to the vitality of a village.</u>
18.45	CFLR7	The Theatres Trust recommends for clarity and consistency that the following is included: 'community facilities provide for the health and wellbeing, social, educational, recreational, leisure and cultural needs of the community.' This would obviate the need to provide examples.	Agreed, description provides clarity. However, it is considered helpful to also include examples as set out in paragraph 18.8.1 (renumbered 18.9.1).	Amendment to paragraph 18.8.1 (renumbered 18.9.1) <u>Community facilities provide for the health and wellbeing, social, educational, recreational, leisure and cultural needs of the community.</u> Community facilities include, but are not limited to: art galleries...
18.46	CFLR7 I (b) & (c)	Part 1 (b) should be amended to refer simply to replacement provision, rather than enhanced provision. As drafted the policy appears to require betterment through development proposals which is not supported by the legal tests in the CIL regulations. Part 1 (c) should be amended to refer to an 'alternative community facility <i>or other use</i> , the need for which would clearly outweigh the loss'. As drafted the policy precludes the possibility that a community facility could be replaced by another form of development.	If demands are increased by new development then it is appropriate to seek to improve existing facilities in order to support that demand. The purpose of this part of the policy is to prevent the loss of essential community facilities and secure their replacement as necessary. If the suggested change is made then this leaves the policy open to misuse. Note: Policy renumbered Policy CFLR9	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
18.47	CFLR7 III (b)	Policy CFLR7 requires proposals to provide for the dual or multiple use of facilities for wider community activities. This is often not suitable for religious needs. CFLR III (b) should be amended to read ‘...to enable multiple uses throughout the day, except where this would conflict with the purpose of the facility, such as facilities used for the practice of faith.’ Alternatively a new clause could be added to CFLR7 which makes specific provision for dedicated facilities used for public religious worship.	Dual/multiple use of facilities is an efficient and sustainable way of meeting local needs especially in rural areas such as East Herts. The approach accords with NPPF Paragraph 70 which encourages the provision and use of shared space. (IV) states that proposals ‘ <u>should aim</u> to provide for dual or multiple use of facilities....’ The use of the word ‘should’ leaves rooms for exceptions, allowing applicants to justify why the policy does not apply to them. If particular circumstances exist which mean that multiuse is not possible then any application would be considered on its merits. Note: Policy renumbered Policy CFLR9	No amendment in response to this issue
18.48	CFLR7 III (c)	The Environment Agency supports part III (c).	Support noted and welcomed.	No amendment in response to this issue
Health and Wellbeing				
18.49	18.9	Based on the housing figures set out in the draft Plan, 18 additional GP’s would be required. This would require additional surgery premises of a minimum of 3,582m ² across the areas affected. Currently, there are concerns in respect of the capacity of local practices to accept the impact of additional patients from developments in Bishop’s Stortford, Buntingford, Hertford, Sawbridgeworth, Ware, Gilston, East of Welwyn Garden City and practices affected by Group 1 Villages. Based on this, NHS England would be looking for	Comments noted. The District Council will continue to work with NHS England to ensure that adequate health care provision is provided as a result of housing growth.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
		significant CIL and/or S106 contributions to support General Medical Service provision in the area.		
18.50	18.9	Concern that the level of growth in the district will not be accompanied by adequate NHS facilities. There are A&E departments available in Essex and Stevenage. The future provision at QE2 seems vague. The time and distance that it takes to reach a hospital is a major concern especially with the growth in the elderly population.	Comments noted. The District Council are currently working with NHS England to ensure that adequate health care provision is provided as a result of housing growth. CFLR8 (renumbered CFLR10) requires contributions towards new or enhanced health facilities where new housing results in a shortfall or worsening of provision.	No amendment in response to this issue
18.51	18.9.2	Sport England support the role that planning can have in encouraging healthy and inclusive communities. The reference to Sport England guidance is endorsed although it is suggested that explicit reference is made to their Active Design guidance document as this is the most relevant document in the context of how development can be designed to encourage physical activity.	Agreed.	Amendment to orange box following paragraph 18.9.2 (renumbered 18.10.2) The Sport England guidance note on Planning Activity into Developments can be viewed and downloaded at: www.sportengland.org/facilities-planning/planning-for-sport/ <u>The Sport England guidance note on Active Design provides a set of design guidelines to promote opportunities for sport and physical activity in the design and layout of development and can be viewed here:</u> <u>http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</u>

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
18.52	CFLR8	The Canal & River Trust supports Policy CFLR8 and recognises that waterspace and towpaths along with other forms of open space and green infrastructure can play a big role in the promotion of healthy communities on many levels. In areas of new development, these areas could be considered as places to provide and enhance informal health facilities, such as open air gyms.	Support and comments noted and welcomed.	No amendment in response to this issue.
18.53	CFLR8	Natural England states that CFLR8 (I) may be enhanced by specific reference to Green Infrastructure as this could be used to deliver the infrastructure and health benefits listed.	It is considered that the role of Green Infrastructure is clear within the Policy.	No amendment in response to this issue
18.54	CFLR8	The Theatre's Trust highlight recent guidance on health and wellbeing, whilst wellbeing is not defined it is considered that health should also include social and cultural wellbeing. It is suggested that 'wellbeing' be included in the enhancement and provision of community facilities and retain Policy CFLR8 solely for health and the provision of medical facilities, or incorporate an item on health facilities within Policy CFLR7 as it deals with community facilities.	Changes are already proposed to capture social and cultural wellbeing in paragraph 18.8.1 (renumbered 18.9.1). Therefore Policy CFLR7 (renumbered CFLR8) will capture those elements under the umbrella of community facilities.	No amendment in response to this issue
Education				
18.55	18.10	Education is mentioned last almost as an afterthought; should be much more prominent! A lot of waffle and extremely vague.	Education is not an afterthought. Section 18.10 (renumbered 18.11) clearly acknowledges the importance of access to education. There is also a section on Lifelong Learning in Chapter 14 (Economy), which acknowledges the importance of higher education and adult learning opportunities.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
18.56	18.10	There is a shortage of local places in Hertford/Ware but that is due to students travelling long distances from other towns. You probably can't do anything about schools autonomy but this should recognise that the shortage isn't due to a local imbalance.	Comments noted. The District Council is working closely with Hertfordshire County Council to ensure that there are sufficient school places available to serve new housing developments.	No amendment in response to this issue
18.57	18.10.3	<p>HCC comment that it may be more relevant for the Plan to point out the need for HCC, the District Council and developers to work together to ensure the best outcome for school provision. This joint working is alluded to in CFLR9.</p> <p>The last sentence of paragraph 18.10.3 should be reworded to identify that investment will come from housing growth in direct response to the demand that growth will generate.</p>	Agreed. Reference also added to other neighbouring local authorities with a duty for ensuring that there are sufficient school places available to serve new housing developments, to ensure appropriate facilities are provided.	<p>New paragraph 18.11.4</p> <p><u>To ensure the best outcome for school provision, applicants should work with HCC, the District Council and other neighbouring local authorities with a duty for ensuring that there are sufficient school places available to serve new housing developments, to ensure appropriate facilities are provided.</u></p> <p>Amendment to paragraph 18.10.3 (renumbered 18.11.3)</p> <p>...It is therefore vital that <u>where housing growth results in increased demand this should provide for</u> investment is made across each education tier to ensure there are enough places to serve the district's pupils within their community.</p>
18.58	CFLR9	Essex County Council recommends that CFLR (I) should read: "Development that creates a potential increase in demand for education will be required to make appropriate provision for facilities either on-site or by making a suitable contribution towards the improvement or expansion of nearby existing facilities.	Agreed. See also new paragraph 18.11.4.	<p>Amendment to Policy CFLR9 (renumbered CFLR11)</p> <p>I. ...Applicants will be expected to work in partnership with Hertfordshire County Council <u>and</u></p>

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
		Applicants will be expected to work in partnership with HCC and other neighbouring local authorities with a duty for ensuring that there are sufficient school places available to serve new housing developments, to ensure appropriate facilities are provided.”		<u>other neighbouring local authorities with a duty for ensuring that there are sufficient school places available to serve new housing developments,</u> to ensure appropriate facilities are provided.
18.59	CFLR9	<p>Policy supported, however, it does nothing to assist in positively planning for the physical delivery of school expansions in the Green Belt.</p> <p>The LPA should ensure there is a more favourable policy context seeking to guide and facilitate school expansions - not just new schools.</p> <p>The soundness of the Plan would be improved if the Local Planning Authority identifies an education zone within the Green Belt to cover the school and school reserve land. The policy applying to it could be worded along similar lines to those to be found in the adopted Dacorum Core Strategy:</p> <p>‘The provision of new school facilities will be supported on Open Land and in defined zones in the Green Belt. Zones will be defined in the Green Belt where there is clear evidence of need: the effect of new building and activity on the Green Belt must, however, be minimised.</p> <p>All new development will be expected to contribute towards the provision of social infrastructure.’</p> <p>The LPA could identify an education zone at Watton School covering both the operational school site, the reserve land adjacent and the Early Years Centre.</p>	<p>Support welcomed, however, an education zone approach is not considered necessary, or one that can be evidenced.</p> <p>The Council is currently undertaking further Green Belt Review work which will include looking at the Watton School site.</p>	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
18.60	CFLR9	A number of additional schools are proposed which have more to do with Mr Gove's Central Government dictates than planning. The allocation of Simon Balle for an additional primary school is an example. The area already has 3 primary schools and the new school should go near the centre of the town where there is a need. There is no indication that new development should be to the highest environmental standards.	Comments noted, however, planning permission for the primary school at Simon Balle has now been granted. Chapter 16 – Design – provides information on how to design developments in the most sustainable way including reference to Building Futures and Building for Life 12. Policy DES1 requires all development proposals to be of a high standard of design, including embracing sustainable construction. The Plan as a whole addresses the major sustainability issues that arise when constructing a new building.	No amendment in response to this issue
18.61	CFLR9	HCC support this policy. However, under part III (a) the meaning of 'suitably located' is unclear. Within a development where a new school is required this facility would be expected to be provided within the development site. In terms of the expansion of an existing school to provide school places arising from a new development, 'suitably located' may not mean the nearest school to that development. A number of schools are located within school place planning areas. It may not be possible to expand the closest school to a development but another in that area may have the ability to provide additional capacity.	Part I of CFLR9 (renumbered CFLR11) contains the flexibility needed for new provision to be located in line with both the needs and where improvements are possible. Part III.a could be changed to 'be in an accessible location', served by a choice of sustainable travel options. Reference could also be added to Policy DES1 as this covers issues such as siting of development.	Amendment to Policy CFLR 9 (renumbered CFLR 11) Part III.(a) be <u>in an accessible location</u> suitably located , served by a choice of sustainable travel options; (b) Be of the highest quality of design which offers flexible use of facilities, in order to ensure the various needs of the community can be met, <u>in accordance with Policy DES1 (Local Character and Amenity)</u> (see also Policy ED6 (Lifelong Learning));
18.62	CFLR9 III (b)	HCC comment that highest quality design can often mean higher construction costs. The design of any new school building would take account of the principles of sustainable development, together with the sensitivities of its setting, including, where	Concern noted, however, the policy states that proposals 'should' be of the highest quality of design. The use of the word 'should' leaves rooms for exceptions, allowing applicants to justify why the policy	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
		relevant, its relationship to any listed buildings or Green Belt location. There is a finite budget when providing new or extended schools and it should be noted that many of these facilities will be funded by developer contributions. It is requested that this wording is reconsidered.	does not apply to them.	
18.63	CFLR9 III (c)	Sport England support criterion (c) of this policy as the provision and retention of outdoor recreation space and playing fields are one of the principal forms of community playing pitch provision. Due to the difficulties associated with finding suitable sites and delivering new dedicated community playing fields in East Herts, new school playing fields represent one of the main opportunities for assisting to address community needs. Also, the provision and retention of playing fields enables schools to meet curricular and extra-curricular PE and sport's needs.	Support noted and welcomed.	No amendment in response to this issue
18.64	CFLR9 III (d)	Sport England support criterion (d) of this policy as this should help ensure that new schools are designed to facilitate community use which would help meet community needs as well as principal educational requirements. This approach accords with NPPF paragraph 70. CFLR1 should also be cross referenced as this covers proposals for dual use facilities in the context of open space, sports and recreation.	Support noted and welcomed. (d) amended to also refer to CFLR1 (IV)	Amendment to Policy CFLR9 (renumbered CFLR11) (d) Be designed to facilitate the community use of facilities, in accordance with Policy CFLR7 (Community Facilities) <u>and Policy CFLR1 (IV) (Open Space, Sport and Recreation)</u> .
18.65	CFLR9	Pleased that the draft plan recognises that Stanstead Abbots primary school has reached capacity. However concerned that the growth in Hertford and Ware will make it harder for Stanstead Abbots children to get into the best secondary schools.	Noted.	No amendment in response to this issue

19 Natural Environment

19.1 Introduction

- 19.1.1 The natural environment is one of the district's greatest resources. Environmental quality is however under threat from many directions. The District Council is therefore committed to conserving and enhancing those important landscape and townscape elements which form a key part of the district's character and the quality of life of its residents.

19.2 Nature Conservation

- 19.2.1 Nature conservation is an integral part of the planning system and as such needs to be taken into consideration in any development. Ensuring that future generations can enjoy the district's rich geological and biological inheritance as well as the wider experience that a healthy, functioning natural environment can provide means that we must continue to improve the protection and management of what we have today.

- 19.2.2 To assist with this the most important areas in the district are identified on the Policies Map. These include sites of international, national and local importance. 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 continue to work with the Hertfordshire Environmental Records Centre as the primary resource for ecological data in the County.~~refer to the most up-to-date position.~~ Applicants will be expected to seek the advice of the Herts and Middlesex Wildlife Trust, the Hertfordshire Environmental Records Centre, Hertfordshire Ecology at the County Council, Countryside Management Service, Natural England, and other relevant local nature partnerships where appropriate, where proposals affect or have the potential to affect the natural environment and nature conservation assets.

Links to useful guides, documents and websites produced by these and other relevant organisations can be found in the Bibliography in Appendix F.

Table 19.1 Designated Environmental Assets

Type of designation	Purpose of designation
International Special Areas of Conservation (SAC)	Classification under the European Union's Habitats Directive of areas of value for species, plants and habitats. Together with SPAs, SACs form part of the Natura 2000 system.
International Special Protection Areas (SPA)	Classification under the Birds Directive to protect internationally valuable populations of eligible bird species.
International Ramsar Sites	Designation under the Ramsar Convention for wetlands of international importance.
National Sites of Special Scientific Interest (SSSI)	<u>Sites designated by Natural England under the Wildlife and Countryside Act 1981.</u> Protection of the most significant sites for the conservation of wildlife (species & habitats) and/or geology.
National National Nature Reserves (NNR)	Areas managed for either (or both) the preservation of flora, fauna, geological and physiological features of special interest or to provide opportunities to study fauna, flora and their physical conditions.
<u>At Least</u> Local Local Nature Reserves (LNR)	Places of special local wildlife, <u>or geological or educational</u> interest or significance identified by local authorities. <u>Where these sites are also designated as SSSIs they will be a national importance.</u>
Local Local Wildlife	Sites of importance for their scientific, educational and historical value as well as their visual qualities. <u>Designated land of local and regional</u>

Sites (WS)	<u>importance defined as discrete areas of land considered to be of significance for their wildlife features. They are the most important places for wildlife outside legally protected land such as SSSIs.</u>
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- 19.2.3 Sites of international importance currently designated within the district include:
- Wormley-Hoddesdonpark Woods – Special Area of Conservation (SAC)
 - Rye Meads and Amwell Quarry – components of the Lee Valley Special Protection Area (SPA)
 - Rye Meads and Amwell Quarry – components of the Lee Valley Ramsar Site
- 19.2.4 All international sites in the district are also designated as SSSI's. SSSI's protect England's finest wildlife and geological sites. Natural England, under the Wildlife and Countryside Act 1981 (as amended), is responsible for designating and assessing these sites working closely with landowners and site managers to ensure that targets to maintain and improve their condition are met. The 2012 Government Strategy 'Biodiversity 2020' set out commitments to bring 50% of the total area of SSSI's into 'favourable condition' by 2020. There are 16 SSSI's in the district.
- 19.2.5 The only National Nature Reserve (NNR) in Hertfordshire is located in the south of the district at Broxbourne-Hoddesdonpark Woods. The Nature Reserve contains several woodlands of SSSI status, which are home to many rare and scarce woodland wildlife.
- 19.2.6 Advice should be sought from Natural England for any proposals that may potentially affect an international or national site.
- 19.2.7 Local Wildlife Sites in the district are identified by the Hertfordshire Local Wildlife Sites Partnership which is a partnership approach to the identification, selection, assessment and protection of Local Wildlife Sites in the County, led and coordinated by the Herts and Middlesex

Wildlife Trust. Local Wildlife Sites (WS) are considered to be of significance for wildlife in at least a district context. There are currently ~~573~~⁵⁴⁴ Wildlife Sites in the district covering ~~3,462~~^{3,442} hectares. There are also ~~currently~~ 14 Herts and Middlesex Wildlife Trust Reserves in the district, seven of which are SSSIs and one, Waterford Heath, is a Local Nature Reserves (LNR) (~~as protected by~~^{under} the National Parks and Access to the Countryside Act, 1949, as amended), in the district, including 4 Flagship Reserves:

- ~~Amwell~~
- ~~Balls Wood~~
- ~~Kings Meads~~
- ~~Rye Meads~~

19.2.8 Distinctions will be made between the hierarchy of international, national and locally designated sites so that protection is commensurate with their status and appropriate weight will be given to their importance and the contribution they make to wider ecological networks. It is however, important that opportunities are taken to enhance biodiversity wherever possible, especially in urban areas, as even non-designated environments contribute significantly to the success of the wider ecological network.

19.2.9 The NPPF requires local planning authorities to apply a mitigation hierarchy. In the context of the natural environment this means that policies should seek to create net gains in biodiversity, to avoid adverse impacts by considering alternative options, to use mitigation measures where avoidance is not possible and as a last resort to use compensatory measures.

Policy NE1 International, National and Locally Designated Nature Conservation Sites

I. Development proposals, land use or activity (either individually or in combination with other developments) which are likely to have a detrimental impact which adversely affects the integrity of a site, will not be permitted unless it can be demonstrated that there are reasons which clearly outweigh the need to safeguard the nature conservation value of the site, and any broader impacts on the international, national, or local

network of nature conservation assets. Evidence will be required in the form of up-to-date ecological surveys undertaken by a competent ecologist prior to the submission of an application. Where insufficient data is provided, permission will be refused.

II. Where a site of International or National designation for nature conservation importance ~~priority species or habitat on the site~~ is adversely affected by the proposals, permission will be refused unless the District Council is ~~will need to be~~ satisfied that:

(a) There are imperative reasons of overriding public interest, which could be of a social or economic nature, sufficient to override the harm to the site;

(b) There are imperative reasons of overriding public interest relating to human health, public safety or benefits of primary importance to the environment.

III. ~~In exceptional circumstances where proposals are allowed which would damage the nature conservation value of the International, National or Local Site, any adverse impact to designated sites should only occur as a last resort, and should be compensated by replacement with a feature of comparable or higher ecological value.~~ Proposals should avoid impacts on sites of nature conservation value and wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate. Such compensatory schemes should seek to achieve a net gain for nature and the ~~The District Council will consider the use of conditions and/or planning obligations to provide~~ secure ~~appropriate mitigation/compensation.~~

NE2 Sites of Nature Conservation Interest (Non-Designated)

I. All proposals should achieve a net gain in biodiversity and avoid harm to, or the loss of features that contribute to the local and wider ecological network.

II. Proposals will be expected to apply the mitigation hierarchy of avoidance, mitigation and compensation, and integrate planting and landscaping into the overall design.

19.3 Species and Habitats

19.3.1 The planning system has a central role to play through resisting development proposals that may irreversibly damage important species or habitats, by enhancing biodiversity through incorporating mitigation and enhancements and by securing long-term favourable management of biodiversity rich sites.

19.3.2 Biodiversity describes the number and variety of species of plants and animals within a habitat and also the diversity of habitats within an ecosystem. Biodiversity has economic importance, adds to our quality of life and contributes to local distinctiveness as well as securing Ecosystem Services such as pollination, hydrology and pest control for example.

19.3.3 Whilst protecting priority species and habitats (as listed under Section 41 of the Natural Environment and Rural Communities Act 2006) is important, if biodiversity is to be genuinely enhanced, the conservation of all wildlife and habitats needs to be at the centre of development and planning decision making.

A list of Species and Habitats of Principle Importance, as published in Section 41 of the Natural Environment and Rural Communities Act 2006, can be viewed in the form of a spread-sheet at: <http://publications.naturalengland.org.uk/publication/4958719460769792?category=10002>.

Government legislation exists which places legal obligations on Local Planning Authorities and landowners with regards to the protection and enhancement of European Sites, protected species and Sites of Special Scientific Interest. More information can be viewed on the Government's document website at: www.gov.uk

The Herts and Middlesex Wildlife Trust website also contains a useful list of relevant environmental law at: www.hertswildlifetrust.org.uk/what-we-do/planning/wildlife-and-law

- 19.3.4 While there are no longer national habitat or species targets, the Hertfordshire Biodiversity Action Plan (2006) identifies those habitats and species which are a priority for conservation and is a valuable source of information on the county's natural assets.

The Hertfordshire Biodiversity Action Plan (2006) can be viewed and downloaded from the Hertfordshire Environmental Forum at: www.hef.org.uk/nature/biodiversity_vision/

- 19.3.5 The Hertfordshire Local Nature Partnership (LNP), working in conjunction with Herts and Middlesex Wildlife Trust, Hertfordshire County Council and Natural England have recently published an up-to-date report on Hertfordshire's habitats which identifies areas where new habitats should be created to support the wider ecological network. The LNP has also produced a suite of guiding principles to assist with planning for the natural environment. The Council will expect proposals to be prepared in line with these documents.

- 19.3.56 Development should be planned to avoid habitat loss and fragmentation, and opportunities should be sought to improve ecological connectivity, including through the creation, restoration and enhancement of linking habitats and 'stepping stones' through the landscape. Any development should minimise impacts on biodiversity and provide net gains for nature where possible. This involves safeguarding and enhancing biodiversity already present, providing new areas of habitat appropriate to the ecology of the area and integrating biodiversity within new development. Encouragement will be given to proposals which improve the biodiversity value of sites and to the establishment of local nature reserves where the nature conservation and landscape interest of the site will be protected and enhanced.

- 19.3.67 Where there is evidence of European Protected Species (EPS) such as bats, great crested newts, dormice or otters, the Council will apply the following three derogation tests as required by the European Habitats and Birds Directives:

- The activity must be for imperative reasons of overriding public interest or for public health and safety;
- There must be no satisfactory alternative; and
- Favourable conservation status of the species must be maintained.

19.3.7⁸ Where damage to a species or habitat is unavoidable, development should be designed to conserve as much of the original habitat as possible and retain and protect wildlife corridors. It should seek to avoid damage to, or adverse effects upon, existing biodiversity (species and habitats) through appropriate site design. ~~Where there may be no significant harm to species or habitats there may be potential opportunities to provide new benefits for wildlife, for example by habitat creation or enhancement.~~

19.3.8⁹ There may be potential opportunities to provide new benefits for wildlife, for example by habitat creation or enhancement, whether or not significant harm to species or habitats is anticipated. Examples of how enhancements could be achieved include:

- Planting native trees and species rich shrubs and hedgerows of local provenance
- Creation of orchards, wildflower grasslands and nature reserves
- Connecting existing habitats and enhancing migratory routes with additional planting (including green roofs and walls and species-rich hedgerows)
- Creation of ponds
- Provision of roosting opportunities for bats and birds
- River or stream restoration
- Sustainable Urban Drainage Systems

19.3.9¹⁰ Planning obligations and conditions may be used to secure agreed measures such as mitigation or compensation. Mitigation measures could involve some of the following:

- Timing the development of sites to avoid the breeding seasons or hibernation periods for species present
- Creating buffer zones between sensitive areas and development areas to reduce disturbance to habitats

- Ensuring that development is designed to enable the movement of wildlife to continue

19.3.40¹¹ Compensation which in most cases should be a last resort, involves creating new replacement habitats either on-site or off-site in the form of biodiversity offsetting. However, compensation for a lost habitat will not make an unacceptable development acceptable.

Policy NE³² Species and Habitats

I. Development should always seek to enhance biodiversity and to create opportunities for wildlife. Proposals must demonstrate how the development improves the biodiversity value of the site and surrounding environment. Evidence will be required in the form of up-to-date ecological surveys undertaken by a competent ecologist prior to the submission of an application. Where insufficient data is provided, permission will be refused.

II. Proposals should detail how physical features will be maintained in the long term.

III. Development which would result in the loss or significant damage to trees, hedgerows or ancient woodland sites will not be permitted. The Council will seek their reinforcement by additional planting of native species where appropriate.

IV. Proposals will be expected to protect and enhance locally important biodiversity sites and other notable ecological features of conservation value.

V. Proposals should avoid ~~Development proposals which may have an impact~~ing ~~on Species and Habitats of Principle Importance included in the England Biodiversity List~~ as ~~published under section 41 of the Natural Environment and Rural Communities Act 2006 (or as subsequently amended).~~ will only be permitted where harm to the species and habitats can be avoided.

~~II. Locally important biodiversity sites and other notable ecological features of conservation value will also be protected and enhanced.~~

~~III. Development which would result in the loss or significant damage to trees, hedgerows or ancient woodland sites will not be permitted. The~~

~~Council will seek their reinforcement by additional planting of native species where appropriate.~~

~~IV. Developments should demonstrate how the proposal improves the biodiversity value of sites and enhances their nature conservation interest, such as through the establishment of local nature reserves. If providing such features as part of a development, applicants should detail how it will be maintained in the long term.~~

~~VI. Where in exceptional circumstances exist that outweighs any harm or damage to a species or habitat appropriate mitigation and compensation measures must be employed, is unavoidable, any adverse impact should only occur as a last resort. The District Council will impose conditions / planning obligations which seek to:~~

- ~~(a) Facilitate the survival of existing populations as well as encouraging the provision of new populations;~~
- ~~(b) Reduce disturbance to a minimum;~~
- ~~(c) Provide adequate alternative habitats to sustain at least the current levels of populations.~~

~~The England Biodiversity List can be viewed and downloaded from the Habitats and Species of Importance pages of the Natural England Website at: www.naturalengland.org.uk~~

19.4 Green Infrastructure

19.4.1 The NPPF describes Green Infrastructure as “*a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities*” (Annex 2: Glossary, NPPF, CLG, 2012).

19.4.2 The Council’s Green Infrastructure Plan (part of a county-wide suite of Green Infrastructure Plans) provides an overview of existing green infrastructure assets within the district, considers opportunities for the enhancement and creation of new assets, outlines a series of potential projects and provides advice on delivering green infrastructure proposals. More information on the ecological networks in

the district can also be found in the Local Nature Partnership's Ecological Network Report.

The Council's Green Infrastructure Plan can be viewed and downloaded from the Council's Website at: www.eastherts.gov.uk/gip

19.4.3 East Herts has a rich green infrastructure resource centred on the principal river valleys of the Lee, Mimram, Beane, Quin, Rib, Ash and Stort in addition to a varied mosaic of landscape and habitat types, such as grassland, ancient and plantation woodland and farmland of importance to wildlife. However, through time and changing pressures on the use of land, these habitats have become fragmented and disconnected. While these sites still contribute towards the district's green infrastructure, improvements are necessary in order to strengthen their quality, connectedness and resilience to changing climates and the impact of human activity, and to provide opportunities for other green infrastructure functions.

19.4.4 Street trees, gardens, waterways, public parks and open spaces all contribute to urban green infrastructure. Quite often such urban green infrastructure is the only 'natural environment' we connect with on a day-to-day basis. Yet these features contribute significantly in cleaning and cooling the air, preventing flooding, providing 'stepping stones' for wildlife and for recreational activity and enjoyment. It is therefore important that changes to the district's urban environments contribute to the wider green infrastructure network. ~~Development should be planned to avoid habitat loss and fragmentation, and opportunities should be sought to improve ecological connectivity, including through the creation, restoration and enhancement of linking habitats and 'stepping stones' through the landscape.~~

19.4.5 It is important to remember that habitats and landscapes in East Herts are part of a wider network of green infrastructure that pays no heed to local authority boundaries. For example, the woodland to the south of the District forms part of the swathe of woodland and other habitats that stretch around London, which is commonly known as the GreenArc. Development should therefore be planned to avoid habitat loss and fragmentation, and opportunities should be sought

to improve ecological connectivity, including through the creation, restoration and enhancement of linking habitats and 'stepping stones' through the landscape.

19.4.5⁶ The Council welcomes the use of green infrastructure as an alternative solution to 'grey' infrastructure (such as water management and waste). Such schemes can provide opportunities for flood attenuation and public open spaces and can often be cheaper to construct and maintain.

19.4.6⁷ Applicants will be expected to seek the advice of the Herts and Middlesex Wildlife Trust, the Hertfordshire Environmental Biological Records Centre, Hertfordshire Ecology at the County Council, Countryside Management Service, and Natural England, and other relevant local nature partnerships where appropriate, where proposals affect or have the potential to enhance green infrastructure and nature conservation assets.

Policy NE⁴³ Green Infrastructure

I. A diverse network of accessible, multi-functional green infrastructure across the district will be protected and enhanced for its biodiversity, recreational, accessibility, health and landscape value and for the contribution it makes towards combating climate change.

II. Development proposals should:

(a) Avoid the loss, fragmentation or functionality of the green infrastructure network, including within the built environment, such as access to urban waterways;

(b) Maximise opportunities for improvement to the green infrastructure network in accordance with the Council's Green Infrastructure Plan, its Parks and Open Spaces Strategy, the Hertfordshire Biodiversity Action Plan, Living Landscape Schemes, locally identified Nature Improvement Areas and any future relevant plans and programmes as appropriate;

(c) Maximise opportunities for urban greening such as through appropriate landscaping schemes and the planting of street trees;

(d) Consider the integration of green infrastructure into proposals

as an alternative or to complement complement 'grey' infrastructure.

III. Contributions towards local green infrastructure projects will be sought where appropriate. If providing green infrastructure as part of a development, applicants should detail how it will be maintained in the long term.

IV. Proposals which affect the district's river environments, including built development and recreation and leisure proposals, should take into account and contribute towards achieving, the aims of any statutory or non-statutory plans, such as the Lee Valley Regional Park Authority Park Development Framework, the Bishop's Stortford Waterspace Strategy, relevant River Catchment Management Plans and the Water Framework Directive, and any future relevant plans and programmes.

~~The Draft East Herts Parks and Open Spaces Strategy (2013-2018) can be viewed and downloaded at: www.eastherts.gov.uk/parksstrategy~~

~~For more information on Living Landscape Schemes, see the Herts and Middlesex Wildlife Trust Website at: www.hertswildlifetrust.org.uk~~

~~For more information on the Bishop's Stortford Waterspace Strategy go to: www.eastherts.gov.uk/bishopsstortfordwaterspacestrategy~~

~~For more information on the River Stort Catchment Management Plan go to: www.stortriverpartnership.org.uk~~

~~For more information on the River Beane and Mimram River Catchment Management Plan go to: www.beaneandmimrampartnership.org.uk~~

~~For more information on the Water Framework Directive go to: <http://ec.europa.eu/environment/water/>_____~~

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Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
19.1 Introduction				
19.1	19.1.1	Habitat-based contextual LNP Ecological Network maps in places bear little or no relation to the map of Habitats and Biodiversity plan as presented in the Background and Overview document. It is important that up-to-date evidence is used.	The council cannot control the detail of maps produced by external parties in documents prepared for a particular purpose. The Plan refers to the need to refer to up-to-date evidence and to work with the Council's partners in these matters.	No amendment in response to this issue
19.2	19.1.1	Herts Ecology support the view that the natural environment is one of the districts greatest resources.	Support noted and welcomed.	No amendment in response to this issue
19.2 Nature Conservation				
19.3	19.2	Should refer to the Hertfordshire Environmental Records Centre as the primary resource for ecological data.	Paragraph 19.2.2 can be expanded to add reference to HERC (and others as appropriate) and a new text box added which advises readers to look in the new bibliography where they can find more information and links to relevant guidance.	Amendment to paragraph 19.2.2 and new text box ...The Council will <u>continue to work with the Hertfordshire Environmental Records Centre as the primary resource for ecological data in the County.</u> refer to the most up-to-date position <u>Applicants will be expected to seek the advice of the Herts and Middlesex Wildlife Trust, the Hertfordshire Environmental Records Centre, Hertfordshire Ecology at the County Council, Countryside Management Service, Natural England, and other relevant local nature partnerships where appropriate, where proposals affect or have the potential to affect the natural environment and nature conservation assets.</u> <u>Links to useful guides, documents and websites produced by these and other relevant organisations can be found in the Bibliography in Appendix F.</u>
19.4	19.2	Herts and Middlesex Wildlife Trust (HMWT) suggest there are a few documents that could be referenced: Gunnell, Murphy and Williams (2013) <i>Designing for Biodiversity – A technical guide for</i>	If all references are included there is a danger that the majority of this chapter will become no more than a reference guide to these other documents. It is important to ensure that the East Herts	Amendment to Text – New Text Box before Policy NE1 <u>Links to useful guides, documents and websites produced by these and other relevant</u>

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
		<i>new and existing buildings</i> . 2 nd ed. RIBA and BCT; RSPB (2013) <i>Planning Naturally. Spatial planning with nature in mind: in the UK and beyond</i> ; TCPA and the Wildlife Trusts (2012) <i>Planning for a Healthy Environment – Good practice guidance for green infrastructure and biodiversity</i> .	approach is the primary information. A new text box has been inserted (see row 19.4 above) that refers readers to these references in a new Bibliography. The RIBA and BCT guide can only be purchased so this will be made clear in the Bibliography in Appendix F	organisations can be found in the Bibliography in Appendix F.
19.5	Table 19.1	Herts Ecology and HMWT note that the descriptions in table 19.1 are a little inaccurate and make suggestions to make them more accurate. Glossary definition at end of plan is correct.	Table 19.1 will be amended to elaborate this and to make the descriptions more accurate.	Amendment to Table 19.1 See proposed Table 19.1 in revised chapter
19.6	19.2.5	19.2.5 Should acknowledge that Broxbourne Woods also includes Bencroft Wood and Broxbourne Wood (Herts CC owned), Hoddesdon Wood and Wormley Wood (owned by Woodland Trust). All are within the National nature Reserve (NNR) and are Sites of Special Scientific Importance (SSSI's) and home too many rare and scarce Woodland Wildlife.	Paragraph 19.2.5 could be expanded to include these references.	Amendment to paragraph 19.2.5 The only National Nature Reserve (NNR) in Hertfordshire is located in the south of the district at Broxbourne- Hoddesdonpark Woods. The Nature Reserve contains several woodlands of SSSI status, which are home to many rare and scarce woodland wildlife.
19.7	19.2.7	The text should be amended to read 'Hertfordshire Local Wildlife Sites Partnership'.	Agreed.	Amendment to paragraph 19.2.7 Local Wildlife Sites are identified by the Hertfordshire Local Wildlife Sites Partnership, which is a partnership approach to the identification....
19.8	19.2.7	The list of sites in paragraphs 19.2.3 to 19.2.7 need to clarify the difference between sites that are designated by Natural England or included in local lists or those listed as HMWT reserves. The HMWT reserves are all considered on an equal footing and recommend removing reference to four flagship reserves. Recommended wording 'There are also 14 Herts & Middlesex Wildlife Trust Nature Reserves in the district, seven of which are SSSIs and one is a Local Nature Reserve (under the National Parks and Access to the Countryside Act 1949 as amended)'.	Agreed. Paragraph 19.2.7 will be amended.	Amendment to paragraph 19.2.7 Local Wildlife Sites in the district are identified by the Hertfordshire Local Wildlife Sites Partnership which is a partnership approach to the identification, selection, assessment and protection of Local Wildlife Sites in the County, led and coordinated by the Herts and Middlesex Wildlife Trust. Local Wildlife Sites (WS) are considered to be of significance for wildlife in at least a district context. There are currently 573 Wildlife Sites in the district covering 3,462 hectares. There are also currently 14 Herts and Middlesex Wildlife Trust Reserves in the district, seven of which are SSSIs and one, Waterford Heath, is a Local

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
		HMWT note the only site in East Herts which is known to be listed as a Local Nature Reserve by Natural England is Waterford Heath (also a HMWT nature reserve).		Nature Reserves (LNR) (<u>under</u> as protected by the National Parks and Access to the Countryside Act, 1949 <u>as amended</u>) in the district, including 4 Flagship Reserves: Amwell Balls Wood Kings Meads Rye Meads
19.9	19.2.8	HMWT recommend that the need to protect and restore ecological networks is made more prominent in the plan as a whole. Landscape-scale conservation and restoration recognises the importance of all sites including those in urban areas as contributing to wildlife and ecosystem services. It should be embedded in the Natural Environment policies.	Paragraph 19.2.8 could be expanded to include reference to the need to protect and enhance landscapes and non-designated sites.	Amendment to paragraph 19.2.8 Distinctions will be made between the hierarchy of international, national and locally designated sites so that protection is commensurate with their status and appropriate weight will be given to their importance and the contribution they make to wider ecological networks. <u>It is however, important that opportunities are taken to enhance biodiversity wherever possible, especially in urban areas, as even non-designated environments contribute significantly to the success of the wider ecological network.</u>
19.10	NE1	Natural England appreciate the intention to give internationally and nationally designated sites the highest level of protection however NPPF states: 'Distinctions should be made between the hierarchy of international, national and locally designated sites so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks'.	Initial drafts of the policies did distinguish between sites of different status. However, it was considered that this diluted the strength of protection for sites of less status. These sites play an important role in the wider ecological network, not least because their number are far greater than higher status sites and they often contribute to the success of higher status sites. A new Policy could be created to refer to only non-designated sites of nature conservation importance.	New Policy NE2 <u>New Policy NE2 Sites of Nature Conservation Interest (Non-Designated)</u> <u>I. All proposals should achieve a net gain in biodiversity and avoid harm to, or the loss of features that contribute to the local and wider ecological network.</u> <u>II. Proposals will be expected to apply the mitigation hierarchy of avoidance, mitigation and compensation, and integrate planting and landscaping into the overall design.</u>
19.11	NE1	Herts Ecology states that a variety of site types are mentioned, though smaller sites that may be wildlife havens but which do not fall within these categories are not mentioned.	Additional text is to be added to paragraph 19.2.8. A new policy could be created to refer to non-designated sites.	New Policy NE2 <u>New Policy NE2 Sites of Nature Conservation Interest (Non-Designated)</u>

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
				<p><u>I. All proposals should achieve a net gain in biodiversity and avoid harm to, or the loss of features that contribute to the local and wider ecological network.</u></p> <p><u>II. Proposals will be expected to apply the mitigation hierarchy of avoidance, mitigation and compensation, and integrate planting and landscaping into the overall design.</u></p>
19.12	NE1	The Lee Valley Regional Park Authority support Policy NE1. They note that Amwell and Rye Meads SSSIs are identified as two of the Districts Flagship Reserves. Both could face pressure from future development.	<p>Support noted and welcomed.</p> <p>Reference to Amwell and Rye Meads as flagship reserves has however been deleted on the advice of the Herts and Middlesex Wildlife Trust. Although historically referred to as 'flagship reserves', all HMWT reserves are now considered on an equal footing.</p>	No amendment in response to this issue
19.13	NE1	<p>HMWT and the Lee Valley Regional Park Authority suggest that both Policy NE1 and NE2 should require applicants to submit sufficient and up-to-date info (ecological surveys by competent ecologist) where habitat or features of potential value to the wildlife are affected. Where an applicant fails to provide sufficient information, planning permission should be refused (in line with NPPG para 008 and 016). Having adequate information is necessary for the council to ensure that its policy requirements and its statutory duty are met in terms of being able to assess whether net gains have been achieved.</p> <p>The LVRPA stress the importance of carrying out wildlife and habitat surveys in advance of submitting applications.</p>	Agreed. Policy NE1 and NE2 amended to address this and other issues.	<p>Amendment to Policy NE1</p> <p>I. Development proposals, land use or activity (either individually or in combination with other developments) which are likely to have a detrimental impact which adversely affects the integrity of a site, will not be permitted unless it can be demonstrated that there are reasons which clearly outweigh the need to safeguard the nature conservation value of the site, and any broader impacts on the international, national, or local network of nature conservation assets. <u>Evidence will be required in the form of up-to-date ecological surveys undertaken by a competent ecologist prior to the submission of an application.</u> <u>Where insufficient data is provided, permission will be refused.</u></p>
19.14	NE1 Part III	Natural England considers that there is an overemphasis on compensation. The Policy should be more in line with the measures included in Para. 152 of the NPPF: 'wherever possible,	<p>Agreed. Policy NE1 amended to highlight the need to avoid making such harm in the first place.</p> <p>The new text box before Policy NE1 refers readers</p>	<p>Amendment to Policy NE1 Part III</p> <p>III. In exceptional circumstances where proposals are allowed which would damage the nature conservation value of the</p>

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
		<p>alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate’.</p> <p>The policy should be more proactive in terms of seeking a net gain of biodiversity in line with Para. 9 of the NPPF ‘pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment.... including...moving from a net loss of bio-diversity to achieving net gains for nature.’</p> <p>Herts Ecology state something similar: NE1 should include a Mitigation Hierarchy as outlined in NPPF. This considers: Information, Avoidance, Mitigation and Compensation. Where development cannot satisfy requirements planning permission should be refused (NPPF para 118).</p>	to the Bibliography where these references will be listed..	<p>International, National or Local Site, any adverse impact to designated sites should only occur as a last resort, and should be compensated by replacement with a feature of comparable or higher ecological value.</p> <p><u>Proposals should avoid impacts on sites of nature conservation value and wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate. Such compensatory schemes should seek to achieve a net gain for nature and the</u></p> <p>The District Council will consider the use of conditions and/or planning obligations to provide <u>secure</u> appropriate mitigation/ compensation.</p> <p>New Text Box before Policy NE1 <u>Links to useful guides, documents and websites produced by these and other relevant organisations can be found in the Bibliography in Appendix F.</u></p>
19.15	NE1 + NE2	Herts Ecology note NE1 effectively duplicates NE2 by including reference to Priority Species and Habitats and the aspect of Policy on Species and Habitats.	Policy NE1 part II will be changed to refer to sites of international or national nature conservation importance rather than to priority species or habitats. Also in reference to the Herts Ecology comment on where proposals do not satisfy requirements they should be refused, this section of the Policy NE1 should make this clear.	<p>Amendment to Policy NE1 Part II II. Where a priority species or habitat on the site <u>of International or National designation for nature conservation importance</u> is adversely affected by the proposals, <u>permission will be refused unless</u> the District Council is <u>will need to be satisfied that:</u> ...</p>
Species and Habitats				
19.16	19.3	Strongly welcomed by the HMWT	Support noted and welcomed	No amendment in response to this issue

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
19.17	19.3	Swifts and other bird species need to be taken into account during development as they are present in every proposed housing location. We should ensure there is a space for nature.	This is related to the wider issue raised of needing to be more proactive in seeking net gains in biodiversity. Policy NE2 should be amended to make this proactive approach the priority rather than focussing on where harm could occur. Proposed amendment to paragraph 19.3.8 (renumbered 19.3.9)	Amendment to Policy NE2 (now Policy NE3) See proposed chapter. Amendment to paragraph 19.3.8 (renumbered 19.3.9) 19.3.9 ... • Provision of roosting opportunities for bats and birds ...
19.18	19.3.2	Herts Ecology note that 19.3.2 should include reference to role that maintaining and enhancing biodiversity plays in securing Ecosystem Services e.g. Pollination, hydrology, pest control etc.	Agreed. Paragraph 19.3.2 expanded to refer to these benefits.	Amendment to paragraph 19.3.2 Biodiversity describes the number and variety of species of plants and animals within a habitat and also the diversity of habitats within an ecosystem. Biodiversity has economic importance, adds to our quality of life and contributes to local distinctiveness <u>as well as securing Ecosystem Services such as pollination, hydrology and pest control for example.</u>
19.19	19.3.3	The Environment Agency supports this paragraph.	Support noted and welcomed. Reference to habitats also added to paragraph (see 19.20).	No amendment in response to this issue
19.20	19.3.3	Herts Ecology note 19.3.3 should refer to both priority species and habitats, as listed under S41 of the 2006 NERC Act.	Agreed. Paragraph 19.3.3 amended to make this clear.	Amendment to paragraph 19.3.3 Whilst protecting priority species <u>and habitats (as listed under Section 41 of the Natural Environment and Rural Communities Act 2006)</u> is important, if biodiversity is to be genuinely enhanced, the conservation of all wildlife and habitats needs to be at the centre of development and planning decision making.
19.21	19.3.4	Herts Ecology support reference to the BAP but advise that this has now largely been replaced by the LNP strategies which develop the BAP further.	The BAP is still important in strategic terms but the Draft Plan should make more reference to the Local Nature Partnership in general. A new paragraph should be included to refer to the LNP.	Amendment to text (new paragraph 19.3.5) <u>19.3.5 The Hertfordshire Local Nature Partnership (LNP), working in conjunction with Herts and Middlesex Wildlife Trust, Hertfordshire County Council and Natural England have recently published an up-to-date report on Hertfordshire's habitats which identifies areas where new habitats should be</u>

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
				<u>created to support the wider ecological network. The LNP has also produced a suite of guiding principles to assist with planning for the natural environment. The Council will expect proposals to be prepared in line with these documents.</u>
19.22	19.3.5	The Environment Agency supports this paragraph.	Support noted and welcomed.	No amendment in response to this issue
19.23	19.3.5	Herts Ecology feel 19.3.5 should seek to plan for biodiversity at a landscape scale with the identification of local ecological networks, as promoted by Local Nature Partnership (LNP). Hertfordshire Ecological Networks document provides strong evidence-based approach to identifying ecological networks and a number of key habitats. The LNP is supported by	The proposed amendments to paragraph 19.2.8 above, address this issue. The current wording of paragraph 19.3.5 should be sufficient without repeating paragraph 19.2.8.	No amendment in response to this issue
19.24	19.3.5	The Environment Agency suggests adding reference to the Hertfordshire Local Nature Partnership's ' <i>Planning for Biodiversity and the Natural Environment in Hertfordshire-Guiding Principles</i> ', as well as the Hertfordshire ecological networks mapping report. HMWT also recommend adding this to Section 19.4	As with paragraph 19.3.4 above, it is agreed that the Draft Plan should make more reference to the Local Nature Partnership in general and the guidance they produce as appropriate. The new text box before Policy NE1 refers readers to these documents that are listed in the new bibliography.	Amendment to paragraph 19.3.5 <u>19.3.5 The Hertfordshire Local Nature Partnership (LNP), working in conjunction with Herts and Middlesex Wildlife Trust, Hertfordshire County Council and Natural England have recently published an up-to-date report on Hertfordshire's habitats which identifies areas where new habitats should be created to support the wider ecological network. The LNP has also produced a suite of guiding principles to assist with planning for the natural environment. The Council will expect proposals to be prepared in line with these documents.</u>
19.25	19.3.6	Badgers need to be added to the list.	Badgers are not on the England Biodiversity List of Habitats and Species of Importance.	No amendment in response to this issue
19.26	19.3.6	Herts Ecology feel 19.3.6 could include '...tests as required by the European Habitats Directive' to emphasise the point that this is a legal obligation and not simply a rigorous approach from LPA.	Paragraph 19.3.6 (renumbered 19.3.7) amended to add 'as required by the European Habitats Directive'.	Amendment to paragraph 19.3.6 (renumbered 19.3.7) Where there is evidence of European Protected Species (EPS) such as bats, great crested newts, dormice or otters, the Council will apply the following three derogation tests

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
				<u>as required by the European Habitats and Birds Directives:</u>
19.27	19.3.7	The Environment Agency support this paragraph.	Support noted and welcomed.	No amendment in response to this issue
19.28	19.3.7	HMWT welcome the focus on avoidance of harm, including habitat retention through site design. Recommend that wording be added to ensure mitigation is required where not possible to avoid impacts. Compensation for any residual impact e.g. new habitat creation or habitat restoration/enhancement on site or nearby should be as a last resort. Herts Ecology notes that if the 'Mitigation Hierarchy' is not referred to in Policy NE1, it should be referred to here.	This is related to the wider issue raised of needing to be more proactive in seeking net gains in biodiversity. Policy NE2 should be amended to make this proactive approach the priority rather than focussing on where harm could occur. This approach is considered appropriate to add to the beginning of the chapter before the policies as it applies across each of the policies. However, Policy NE1 Part III may be seen as repetition.	Amendment to text (new paragraph 19.2.9) <u>19.2.9 The NPPF requires local planning authorities to apply a mitigation hierarchy. In the context of the natural environment this means that policies should seek to create net gains in biodiversity, to avoid adverse impacts by considering alternative options, to use mitigation measures where avoidance is not possible and as a last resort to use compensatory measures.</u>
19.29	19.3.8	HMWT suggest that Para. 19.3.7 be split to distinguish between avoidance and enhancement.	Paragraphs 19.3.7 and 19.3.8 (renumbered 19.3.8 and 19.3.9) amended accordingly.	Amendment to paragraphs 19.3. 7 and 19.3.8 (renumbered 19.3.8 and 19.3.9) 19.3.7-8site design. Where there may be no significant harm to species or habitats there may be potential opportunities to provide new benefits for wildlife, for example by habitat creation or enhancement.... <u>19.3.8-9 There may be potential opportunities to provide new benefits for wildlife, for example by habitat creation or enhancement, whether or not significant harm to species or habitats is anticipated.</u> Examples of how enhancements can be achieved include:...
19.30	19.3.8	All developments should respond to available opportunities to provide enhancements for wildlife, whether or not significant adverse impacts are expected. Request that sentence amended to this affect. E.g. "There may be potential opportunities to provide new benefits for wildlife, for example by habitat creation or enhancement, whether or not significant harm to species or habitats is	Renumbered paragraph 19.3.8 (renumbered 19.3.9) to be amended accordingly.	Amendment to paragraph 19.3.8 (renumbered 19.3.9) 19.3.8-9 There may be potential opportunities to provide new benefits for wildlife, for example by habitat creation or enhancement, whether or not significant harm to species or habitats is anticipated. Examples of how enhancements can be achieved include:...

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
		anticipated. Examples of how enhancements could be achieved include...”:		
19.31	19.3.8	Herts Ecology suggest that Para. 19.3.8 should include the planting of wildflower grasslands and new orchards, as they provide excellent habitats for insects etc.	Paragraph 19.3.8 (renumbered 19.3.9) should be amended to add wildflower grasslands and orchards.	Amendment to paragraph 19.3.8 (renumbered 19.3.9) 19.3.9 <u>There may be potential opportunities to provide new benefits for wildlife, for example by habitat creation or enhancement, whether or not significant harm to species or habitats is anticipated.</u> Examples of how enhancements could be achieved include: ... • <u>Creation of orchards, wildflower grasslands and nature reserves....</u>
19.32	19.3.8	The Environment Agency supports this paragraph.	Support noted and welcomed.	No amendment in response to this issue
19.33	19.3.9	The Environment Agency supports this paragraph.	Support noted and welcomed.	No amendment in response to this issue
19.34	19.3.9	Planning obligations should include green roofs, walls, natural planting, simple management.	The Design and Climate change policies already address these issues. The bullet list in renumbered paragraph 19.3.9 could include reference to green roof and walls.	Amendment to paragraph 19.3.8 (renumbered 19.3.9) 19.3.9 <u>There may be potential opportunities to provide new benefits for wildlife, for example by habitat creation or enhancement, whether or not significant harm to species or habitats is anticipated.</u> Examples of how enhancements could be achieved include: ... • Connecting existing habitats and enhancing migratory routes with additional planting <u>(including green roofs and walls and species-rich hedgerows)</u> ...
19.35	19.3.10	Herts Ecology suggest that Para. 19.3.10 could include Biodiversity Offsetting as a means of securing compensation.	This is referred to in the NPPF as a means of compensating the loss of features on-site and therefore needs to be incorporated in the text in paragraph 19.3.10 (renumbered 19.3.11).	Amendment to paragraph 19.3.10 (renumbered 19.3.11) 19.3.11 Compensation which in most cases should be a last resort, involves creating new replacement habitats either on-site or off-site <u>in the form of biodiversity offsetting.</u> However,

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
				compensation for a lost habitat will not make an unacceptable development acceptable.
19.36	NE2	The Environment Agency supports this paragraph.	Support noted and welcomed.	No amendment in response to this issue
19.37	NE2	HMWT and the Lee Valley Regional Park Authority suggest that both Policy NE1 and NE2 should require applicants to submit sufficient and up-to-date info (ecological surveys by competent ecologist) where habitat or features of potential value to the wildlife are affected. Where an applicant fails to provide sufficient information, planning permission should be refused (in line with NPPG Para. 008 and 016). Having adequate information is necessary for the council to ensure that its policy requirements and its statutory duty are met in terms of being able to assess whether net gains have been achieved. The LVRPA stress the importance of carrying out wildlife and habitat surveys in advance of submitting applications.	Agreed. Policy NE1 and NE2 amended to address this and other issues.	Amendment to Policy NE2 (renumbered NE3) See Policy NE2 (renumbered NE3) in proposed chapter.
19.38	NE2 IV	Herts Ecology suggest that part 'IV' should refer to nature reserves rather than local nature reserves to prevent any confusion.	Policy NE2 (renumbered NE3) will change significantly to address this and other issues. Nature reserves has been added to the bullet list in Paragraph 19.3.8 (renumbered 19.3.9)	Amendment to Policy NE2 (renumbered NE3) See Policy NE2 (renumbered NE3) in proposed chapter. Amendment to text (Para. 19.3.8 (renumbered 19.3.9)) 19.3.9 ... • <u>Creation of orchards, wildflower grasslands and nature reserves</u>
19.39	NE2	Herts Ecology note that reference should be made to the LPA's legal obligation concerning European Sites, protected sites and SSSIs. The Department for Environment Food and Rural Affairs (DEFRA) is currently updating its guidance. Which should be referred to, to the effect of ' <i>Updated guidance on</i>	This can be detailed in a new paragraph or text box. This should be linked to advice on the list of Species and Habitats of Principle Importance under the NERC Act.	Amendment to text (new text box after 19.3.3) <u>A list of Species and Habitats of Principle Importance, as published in Section 41 of the Natural Environment and Rural Communities</u>

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
		<i>the legal obligations affecting local planning authorities and developers regarding European sites, protected species and SSSIs is being prepared by DEFRA and will replace the advice currently set out in Circular 06/05: Biodiversity and Geological Conservation'</i>		<p>Act 2006, can be viewed in the form of a spread-sheet at: http://publications.naturalengland.org.uk/publication/4958719460769792?category=10002.</p> <p>Government legislation exists which places legal obligations on Local Planning Authorities and landowners with regards to the protection and enhancement of European Sites, protected species and Sites of Special Scientific Interest. More information can be viewed on the Government's document website at: www.gov.uk.</p> <p>The Herts and Middlesex Wildlife Trust website also contains a useful list of relevant environmental law at: www.hertswildlifetrust.org.uk/what-we-do/planning/wildlife-and-law</p>
19.40	NE2	Useful if term 'locally important biodiversity sites' could be defined.	New text could be added to the Glossary to provide a description.	<p>Amendment to Glossary Locally Important Biodiversity Sites: Normally smaller, isolated sites, including trees, hedgerows or ponds that may not be designated but make a contribution to local or wider ecological networks.</p>
Green Infrastructure				
19.41	19.4.3	The River Mimram, which is the best chalk stream north of the Thames, and a habitat rarer than the tropical rainforest is omitted from the list of local rivers.	This river was omitted in error and should be added to the list.	<p>Amendment to paragraph 19.4.3 East Herts has a rich green infrastructure resource centred on the principal river valleys of the Lee, Mimram, Beane, Quin, Rib, Ash and Stort in addition to a varied mosaic of landscape and habitat types, such as grassland, ancient and plantation woodland and farmland of importance to wildlife.</p>
19.42	19.4.3	Herts Ecology support the overall approach to GI. However the Plan needs to acknowledge the integrated approach to planning and include what	This is partly contained within the Green Infrastructure Plan and the Plan makes new references to the LNP Ecological Networks	No amendment in response to this issue

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
		improvements are necessary and how they are to be sustained.	document. Each Policy in this chapter seeks to encourage an integrated approach to biodiversity and the wider ecological network, which is part of the function of Green Infrastructure.	
19.43	19.4	Herts Ecology note that land management is fundamental, local farming and development and maintenance of food economy is wholly missing from the plan in one of the county's most farming dominated districts.	The majority of these things are beyond the scope of planning policy. The Plan as a whole supports the rural economy and is proactive where it has some influence. Paragraph 19.4.3 references the importance of farmland in green infrastructure terms. Policy ED2 (renumbered ED3) supports agricultural activity and the diversification of farm holdings provided it supports the continued agricultural activity of the farm. However, these issues are more appropriately managed by central government policies on agricultural practices and permitted development rights.	No amendment in response to this issue
19.44	19.4.4	The Environment Agency supports this paragraph.	Support noted and welcomed.	No amendment in response to this issue
19.45	19.4.5	The Environment Agency supports this paragraph.	Support noted and welcomed.	No amendment in response to this issue
19.46	19.4.6	The Environment Agency supports this paragraph.	Support noted and welcomed.	No amendment in response to this issue
19.47	19.4.6	Herts Ecology note applicants should be expected to seek advice of Hertfordshire Ecology which should be at the front of the list being funded by EHDC to provide an ecological advisory service to the District. Herts Ecology provides planning advice while the Environmental Records Centre holds, manages and develops ecological and biological records and information.	Paragraph 19.4.6 should include reference to the renamed HERC and Herts Ecology.	Amendment to paragraph 19.4.6 (renumbered 19.4.7) Applicants will be expected to seek the advice of the Herts and Middlesex Wildlife Trust, the Hertfordshire <u>Environmental Biological Records Centre</u> , <u>Hertfordshire Ecology at the County Council</u> , Countryside Management Service and Natural England, and other relevant local nature partnerships where appropriate, where proposals affect or have the potential to enhance green infrastructure and nature conservation assets.
19.48	19.4	The LVRPA suggest that supporting text to the Green Infrastructure policy should make reference to GreenArc.	A new paragraph could be added to highlight the role of landscapes within East Herts as part of the wider network and to bring in a reference to the GreenArc partnership.	Amendment to paragraphs 19.4.4 and new paragraph 19.4.5 <u>19.4.5 It is important to remember that habitats and landscapes in East Herts are part of a wider network of green infrastructure that pays</u>

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
				<u>no heed to local authority boundaries. For example, the woodland to the south of the District forms part of the swathe of woodland and other habitats that stretch around London, which is commonly known as the GreenArc. Development should therefore be planned to avoid habitat loss and fragmentation, and opportunities should be sought to improve ecological connectivity, including through the creation, restoration and enhancement of linking habitats and 'stepping stones' through the landscape.</u>
19.49	NE3	The Environment Agency support Policy NE3	Support noted and welcomed.	No amendment in response to this issue
19.50	NE3	There needs to be sufficient Green infrastructure with housing growth. Communities will need to be designed to be water neutral, hard surfaces should also be minimised.	The Draft Plan contains a number of policies that seek to address these issues.	No amendment in response to this issue
19.51	NE3	The LVRPA support Policy NE3, and endorse reference to Nature Improvement Areas.	Support noted and welcomed.	No amendment in response to this issue
19.52	NE3	The LVRPA support the single policy for Green Infrastructure due to its complexity and where it refers to many different strands. The reference under Policy CC1 to Green Infrastructure is also endorsed.	Support noted and welcomed.	No amendment in response to this issue
19.53	NE3	Canal and River Trust support the aims of this policy fully and welcome the recognition and support given to the Waterway network in East Herts.	Support noted and welcomed.	No amendment in response to this issue
19.54	NE3	HMWT welcome Policy, in particular references to plans and programmes including Nature Improvement Areas, Living Landscapes and Catchment Management Plans.	Support noted and welcomed.	No amendment in response to this issue
19.55	NE3 Ild	Typo: "complement"	Noted	Amendment to Policy NE3 (renumbered NE4) (d) Consider the integration of green infrastructure into proposals as an alternative or to complement <u>complement</u> 'grey'

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
				infrastructure.
General				
19.56	19	Support for protection of the natural environment. There is an issue with the clearance of sites before applications are submitted. This is a loophole that enables habitat destruction before it can be properly assessed. Where site clearance occurs there should be penalties.	Support noted and welcomed. The clearance of vegetation is not considered development. Once an application has been made conditions would normally be applied that seeks to retain vegetation subject to an appropriate landscaping scheme. However, if the clearance occurs before the application there are no conditions to be in breach of. Where clearance has occurred on sites where there are policy restrictions such as Tree Preservation Orders or other environmental designations, mechanisms do exist through various legislation to impose penalties and ensure replacement planting where necessary. This is a national issue of planning law and not something the Council can control.	No amendment in response to this issue
19.57	19	Development prevents biodiversity.	If done well, development has the potential to create biodiversity through gardens and green spaces which have a greater variety of species than ploughed farmland for example.	No amendment in response to this issue
19.58	19.2 (HERT4)	HERT4 proposal is a connection to the countryside it supports the valuable habitat at Waterford Heath. Any developments around the edge of town should include a 'woodland buffer' to protect views and constrain further development.	<p>This comment will be considered further under Chapter 7: Hertford.</p> <p>Each settlement-specific policy seeks to protect and enhance its surrounding environments. HERT4 currently requires the development to create quality local green infrastructure through the site including opportunities for preserving and enhancing on-site assets, maximising opportunities to link into existing assets and enhance biodiversity. This could be made more explicit in requiring a new green edge to the development to not only act as a green buffer to neighbouring environments but also to define the edge of development, effectively creating a strong</p>	<p>Amendment to Policy HERT4</p> <p>This will be amended in due course.</p>

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
			northern boundary.	
19.59	19.3	Natural England finds much encouragement in the emerging policies and commends the progress East Herts are making towards creating a sound Local Plan; however more progress was expected on the Habitats Regulations Assessments (HRA). The HRA is an important consideration and needs to be taken into account when allocating sites and numbers.	Support noted and welcomed. Concerns regarding the HRA are noted and ongoing discussions are taking place with Natural England and the consultants assisting the Council with this important piece of work. The HRA is dependent upon the cumulative impacts of development in neighbouring authority areas as well in East Herts.	No amendment in response to this issue
19.60	19.3	Land north of Ware is teaming with wildlife, deer's, foxes, hares and rabbits as well as birds particularly in the area around Moles Farm. Thought must be given to wildlife as well.	Noted.	No amendment in response to this issue

Other Proposed Amendments

Location/ Paragraph/Policy	Issue	Proposed Amendment
Throughout the document	Members are concerned that there are too many references within the chapter, which detracts from the particular approach East Herts is promoting.	Amendment to Chapter References to guides and policy documents are to be stripped out and instead one single reference will be made to a list of useful guides and documents within a new bibliography which will be arranged by Chapter.
19.2.4	Reference should be added to refer to a new online tool produced by Natural England on assessing the likely impacts on SSSIs. A new text box has been added to the text before Policy NE1 which refers readers to the new Bibliography, where this link is included.	New Bibliography Appendix F Natural England Impact Risk Zone Tool, designed to help local planning authorities and developers to assess whether a proposed development is likely to affect SSSIs. www.naturalengland.org.uk/ourwork/planningdevelopment/impactriskzonesgistoolfeature.aspx

19.2.4	In October 2014 Natural England was incorporated into the gov.uk website and as such all links and references of documents have been changed. Therefore reference to the England Biodiversity List is now out of date. This reference should also be moved to the re-amble to Policy NE2 (renumbered NE3)	<p>Amendment to Policy NE2 (renumbered NE3)</p> <p>Part V. Proposals should avoid impacting on Species and Habitats of Principle Importance included in the England Biodiversity List^{as} published under section 41 of the Natural Environment and Rural Communities Act 2006 (or as subsequently amended).</p> <p>Amendment to text box after Para. 19.3.3</p> <p>The England Biodiversity List can be viewed and downloaded from the Habitats and Species of Importance pages of the Natural England Website at: www.naturalengland.org.uk <u>A list of Species and Habitats of Principle Importance, as published in Section 41 of the Natural Environment and Rural Communities Act 2006, can be viewed in the form of a spread-sheet at http://publications.naturalengland.org.uk/publication/4958719460769792?category=10002.</u></p>
19.2.7	The latest Annual Monitoring Report indicates a change in the number of Local Wildlife Sites and their size in hectares due to the re-classification of sites and alterations to boundaries. This up-to-date evidence should be included in the revised chapter.	<p>Amendments to text (Paragraph 19.2.7)</p> <p>...There are currently 573 544 Wildlife Sites in the district covering 3,462 3,442 hectares...</p>
Policy NE2 Species and Habitats (Renumbered NE3)	This Policy should be amended to reflect the hierarchy of mitigation and to be more proactive in encouraging enhancements i.e. to first seek gains in habitats and opportunities for biodiversity, to avoid harm, to mitigate where harm is unavoidable and to compensate where harm occurs.	<p>Amendment to Policy NE2 (Renumbered NE3)</p> <p>See proposed Policy NE3 Species and Habitats</p>