



MEETING : DISTRICT PLANNING EXECUTIVE PANEL
VENUE : COUNCIL CHAMBER, WALLFIELDS, HERTFORD
DATE : THURSDAY 25 AUGUST 2016
TIME : 7.00 PM

MEMBERS OF THE PANEL

Councillors L Haysey (Chairman), E Buckmaster and G Jones

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.)

Audio/Visual Recording of meetings

Everyone is welcome to record meetings of the Council and its Committees using whatever, non-disruptive, methods you think are suitable, which may include social media of any kind, such as tweeting, blogging or Facebook. However, oral reporting or commentary is prohibited. If you have any questions about this please contact Democratic Services (members of the press should contact the Press Office). Please note that the Chairman of the meeting has the discretion to halt any recording for a number of reasons, including disruption caused by the filming or the nature of the business being conducted. Anyone filming a meeting should focus only on those actively participating and be sensitive to the rights of minors, vulnerable adults and those members of the public who have not consented to being filmed.

AGENDA

1. Apologies

To receive apologies for absence.

2. Chairman's Announcements

3. Minutes (Pages 7 - 18)

To approve the Minutes of the meeting of the Panel held on 21 July 2016.

4. Declarations of Interests

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

5. East Herts Draft District Plan – New Draft Chapter 1 – Introduction (Pages 19 - 26)

6. East Herts District Plan – New Draft Chapter 2 – Vision and Strategic Objectives (Pages 27 - 42)

7. East Herts Draft District Plan – Chapter 3 – Development Strategy: Response to Issues Raised During Preferred Options Consultation (Pages 43 - 72)

8. East Herts Draft District Plan – Chapter 4 – Green Belt and Rural Area Beyond the Green Belt: Response to Issues Raised During Preferred Options Consultation (Pages 73 - 90)

9. East Herts Draft District Plan – Chapter 6 – Buntingford: Response to Issues Raised During Preferred Options Consultation (Pages 91 - 142)

10. East Herts Draft District Plan – Sawbridgeworth – Settlement Appraisal and New Draft Chapter 8 (Pages 143 - 180)

11. East Herts Draft District Plan – Ware – Settlement Appraisal and New Draft Chapter 9 (Pages 181 - 234)

12. East Herts Draft District Plan – East of Welwyn Garden City – Settlement Appraisal and New Draft Chapter 13 (Pages 235 - 270)
13. East Herts Draft District Plan – Chapter 13 – Housing: Response to Issues Raised During Preferred Options Consultation and Draft Revised Chapter (Renumbered Chapter 14) (Pages 271 - 374)
14. East Herts Draft District Plan – Chapter 25 – Delivery: Response to Issues Raised During Preferred Options Consultation, Further Amendments and Draft Revised Chapter (Renamed Delivery and Monitoring) (Pages 375 - 392)
15. Strategic Land Availability Assessment, August 2016 (Pages 393 - 530)
16. Final Village Hierarchy Study August 2016 (Pages 531 - 552)
17. Duty to Co-operate Update Report (Pages 553 - 572)
18. Urgent Business

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

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MINUTES OF A MEETING OF THE
DISTRICT PLANNING EXECUTIVE PANEL
HELD IN THE COUNCIL CHAMBER,
WALLFIELDS, HERTFORD ON THURSDAY
21 JULY 2016, AT 7.00 PM

PRESENT: Councillor L Haysey (Chairman)
Councillors E Buckmaster and G Jones.

ALSO PRESENT:

Councillors A Alder, M Allen, P Ballam,
R Brunton, S Bull, I Devonshire, M Freeman,
M McMullen, T Page, M Pope, S Rutland-
Barsby and R Standley.

OFFICERS IN ATTENDANCE:

Chris Butcher	- Principal Planning Officer
Martin Ibrahim	- Democratic Services Team Leader
Lorraine Kirk	- Senior Communications Officer
James Mead	- Assistant Planning Officer
Laura Pattison	- Senior Planning Officer
George Pavey	- Planning Officer
Jenny Pierce	- Principal Planning Officer
Claire Sime	- Planning Policy Manager
Kevin Steptoe	- Head of Planning and Building Control Services
Liz Watts	- Chief Executive

14 **HERITAGE IMPACT ASSESSMENT FOR PANSHANGER PARK AND ITS ENVIRONS, JUNE 2016**

The Panel considered a report presenting the findings of the Heritage Impact Assessment (HIA) undertaken for Panshanger Park and its environs. It was proposed that the HIA be used as part of the evidence base to inform and support preparation of the District Plan, and for Development Management purposes.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the Heritage Impact Assessment (HIA) for Panshanger Park and its Environs, June 2016, be agreed as part of the evidence base to inform and support preparation of the East Herts District Plan; and

(B) the HIA for Panshanger Park be agreed as evidence to inform Development Management decisions.

15 **HERTFORD AND WARE EMPLOYMENT STUDY, JUNE 2016**

The Panel gave consideration to the Hertford and Ware Employment Study, June 2016, which comprised a thorough assessment of the economic strength and potential of the two towns. The Panel considered:

- an economic profile of the towns;
- an analysis of the existing and changes to the stock of employment floorspace in the towns;
- a summary profile of each of the employment sites (except GSK in Ware, as it was in single company occupation);
- an analysis of the strengths and weaknesses of the economy of the towns; and,
- recommendations on policy, strategy and

planning for employment land in the towns.

In response to Members' comments and questions, Officers acknowledged the need for the Study's findings on the retention of current employment sites or their re-provision to be reflected in the Hertford and Ware chapters of the District Plan.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the Hertford and Ware Employment Study, June 2016, be approved as part of the evidence base to inform and support the East Herts District Plan; and

(B) the Hertford and Ware Employment Study, June 2016, be approved to inform Development Management decisions.

16 **EAST HERTS DRAFT DISTRICT PLAN – CHAPTER 1 – INTRODUCTION: RESPONSE TO ISSUES RAISED DURING PREFERRED OPTIONS CONSULTATION**

The Panel considered a report detailing the issues raised through the Preferred Options consultation in connection with Chapter 1 (Introduction) of the Draft District Plan Preferred Options version, together with Officer responses to those issues.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the issues raised in respect of Chapter 1 (Introduction) of the Draft District Plan Preferred Options, as detailed at Essential Reference Paper 'B' to the report submitted, be received and considered; and

(B) the Officer response to the issues referred to in (A) above, as detailed in Essential Reference

Paper 'B' to the report submitted, be agreed.

17 **EAST HERTS DRAFT DISTRICT PLAN – CHAPTER 2 –
VISION AND STRATEGIC OBJECTIVES: RESPONSE TO
ISSUES RAISED DURING PREFERRED OPTIONS
CONSULTATION**

The Panel considered the issues raised through the Preferred Options consultation in connection with Chapter 2 (Vision and Strategic Objectives) of the Draft District Plan Preferred Options version, together with Officer responses to those issues.

In response to Members' comments and questions, Officers clarified that due to timing issues, some policy changes had been proposed although not necessarily arising from the comment made. Vehicle Parking standards would be reported to the Panel meeting on 15 September 2016. In noting that the Council had yet to make a decision on the Community Infrastructure Levy (CIL), the Panel Chairman advised that she would be discussing this with Officers.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the issues raised in respect of Chapter 2 (Vision and Strategic Objectives) of the Draft District Plan Preferred Options, as detailed at Essential Reference Paper 'B' to the report submitted, be received and considered; and

(B) the Officer response to the issues referred to in (A) above, as detailed in Essential Reference Paper 'B' to the report submitted, be agreed.

18 **EAST HERTS DRAFT DISTRICT PLAN – CHAPTER 7 –
HERTFORD: RESPONSE TO ISSUES RAISED DURING
PREFERRED OPTIONS CONSULTATION**

The Panel considered the issues raised through the Preferred Options consultation in connection with Chapter 7 (Hertford) of the Draft District Plan Preferred Options version, together with Officer responses to those issues.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the issues raised in respect of Chapter 7 (Hertford) of the Draft District Plan Preferred Options, as detailed at Essential Reference Paper ‘B’ to the report submitted, be received and considered; and

(B) the Officer response to the issues referred to in (A) above, as detailed in Essential Reference Paper ‘B’ to the report submitted, be agreed.

19 **EAST HERTS DRAFT DISTRICT PLAN – CHAPTER 8 –
SAWBRIDGEWORTH: RESPONSE TO ISSUES RAISED
DURING PREFERRED OPTIONS CONSULTATION**

The Panel gave consideration to the issues raised through the Preferred Options consultation in connection with Chapter 8 (Sawbridgeworth) of the Draft District Plan Preferred Options version, together with Officer responses to those issues.

In response to Members’ comments and questions in respect of Issue 8.39 and the Thomas Rivers site, Officers confirmed that this could be looked at again.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the issues raised in

respect of Chapter 8 (Sawbridgeworth) of the Draft District Plan Preferred Options, as detailed at Essential Reference Paper 'B' to the report submitted, be received and considered; and

(B) the Officer response to the issues referred to in (A) above, as detailed in Essential Reference Paper 'B' to the report submitted, be agreed.

20 **EAST HERTS DRAFT DISTRICT PLAN – CHAPTER 9 –
WARE: RESPONSE TO ISSUES RAISED DURING
PREFERRED OPTIONS CONSULTATION**

The Panel considered the issues raised through the Preferred Options consultation in connection with Chapter 9 (Ware) of the Draft District Plan Preferred Options version, together with Officer responses to those issues.

The Panel supported the recommendations now detailed.

RECOMMENDED - that (A) the issues raised in respect of Chapter 9 (Ware) of the Draft District Plan Preferred Options, as detailed at Essential Reference Paper 'B' to the report submitted, be received and considered; and

(B) the Officer response to the issues referred to in (A) above, as detailed in Essential Reference Paper 'B' to the report submitted, be agreed.

21 **EAST HERTS DRAFT DISTRICT PLAN – CHAPTER 11 –
EAST OF WELWYN GARDEN CITY: RESPONSE TO
ISSUES RAISED DURING PREFERRED OPTIONS
CONSULTATION**

The Panel considered the issues raised through the Preferred Options consultation in connection with Chapter 11 (East of Welwyn Garden City) of the Draft District Plan Preferred Options version, together with Officer responses to those issues.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the issues raised in respect of Chapter 11 (East of Welwyn Garden City) of the Draft District Plan Preferred Options, as detailed at Essential Reference Paper ‘B’ to the report submitted, be received and considered; and

(B) the Officer response to the issues referred to in (A) above, as detailed in Essential Reference Paper ‘B’ to the report submitted, be agreed.

22 **EAST HERTS DRAFT DISTRICT PLAN – CHAPTER 12 – GILSTON AREA: RESPONSE TO ISSUES RAISED DURING PREFERRED OPTIONS CONSULTATION**

The Panel gave consideration to the issues raised through the Preferred Options consultation in connection with Chapter 12 (Gilston Area) of the Draft District Plan Preferred Options version, together with Officer responses to those issues.

In response to Members’ comments on the timing of infrastructure provision, Officers explained that working with partners would be crucial and that the Infrastructure Delivery Plan would be submitted to a Panel meeting in September 2016.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the issues raised in respect of Chapter 12 (Gilston Area) of the Draft District Plan Preferred Options, as detailed at Essential Reference Paper ‘B’ to the report submitted, be received and considered; and

(B) the Officer response to the issues referred to in (A) above, as detailed in Essential Reference

Paper 'B' to the report submitted, be agreed.

23 **EAST HERTS DRAFT DISTRICT PLAN – CHAPTER 14 –
EMPLOYMENT: RESPONSE TO ISSUES RAISED DURING
PREFERRED OPTIONS CONSULTATION, FURTHER
AMENDMENTS AND DRAFT REVISED CHAPTER
(RENAMED ECONOMIC DEVELOPMENT)**

The Panel considered a report on the issues raised through the Preferred Options consultation in connection with Chapter 14 (Economy) of the Draft District Plan Preferred Options version, together with Officer responses to those issues. Members noted that further amendments to Chapter 14 (Economy) had been required to ensure that the final draft District Plan reflected the most up-to-date policy position and the latest available evidence. The Panel also considered a draft revised chapter, for subsequent incorporation into the final draft District Plan.

In response to Members' comments and questions, Councillor G Jones referred to supporting the rural economy and the importance of rolling out superfast broadband across the whole District. He also commented on the Council's actions in support for business start-ups through working with Wenta and the Hertfordshire Local Enterprise Project.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the issues raised in respect of Chapter 14 (Economy) of the Draft District Plan Preferred Options, as detailed at Essential Reference Paper 'B' to the report submitted, be received and considered;

(B) the Officer response to the issues referred to in (A) above, as detailed in Essential Reference Paper 'B' to the report submitted, be agreed;

(C) the further amendments in respect of Chapter 14 (Economy) of the Draft District Plan Preferred Options, as detailed at Essential Reference Paper 'B' to the report submitted, be received and considered; and

(D) the draft revised Chapter 14 (Economic Development), as detailed in Essential Reference Paper 'C' to the report submitted, be agreed as a basis for inclusion in the final draft District Plan, with the content being finalised when the consolidated plan is presented in September 2016.

**24 EAST HERTS DRAFT DISTRICT PLAN – CHAPTER 18 –
COMMUNITY FACILITIES, LEISURE AND RECREATION:
RESPONSE TO ISSUES RAISED DURING PREFERRED
OPTIONS CONSULTATION, FURTHER AMENDMENTS
AND DRAFT REVISED CHAPTER**

The Panel considered a report on the issues raised through the Preferred Options consultation in connection with Chapter 18 (Community Facilities, Leisure and Recreation) of the Draft District Plan Preferred Options version, together with Officer responses to those issues. Members noted that further amendments to Chapter 18 (Community Facilities, Leisure and Recreation) had been required to ensure that the final draft District Plan reflected the most up-to-date policy position and the latest available evidence. The Panel also considered a draft revised chapter, for subsequent incorporation into the final draft District Plan.

Councillor E Buckmaster referred to the Council's ongoing work on developing a Leisure Strategy, reviewing its facilities and working with partners to ensure an emphasis on health and wellbeing and to tackle health inequality.

In response to Members' comments and questions, Officers undertook to check the wording relating to "lifetime" and "lifelong" homes to ensure consistency.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the issues raised in respect of Chapter 18 (Community Facilities, Leisure and Recreation) of the Draft District Plan Preferred Options, as detailed at Essential Reference Paper ‘B’ to the report submitted , be received and considered;

(B) the Officer response to the issues referred to in (A) above, as detailed in Essential Reference Paper ‘B’ to the report submitted, be agreed;

(C) the further amendments in respect of Chapter 18 (Community Facilities, Leisure and Recreation) of the Draft District Plan Preferred Options, as detailed at Essential Reference Paper ‘B’ to the report submitted, be received and considered; and

(D) the draft revised Chapter 18 (Community Facilities, Leisure and Recreation), as detailed in Essential Reference Paper ‘C’ to the report submitted, be agreed as a basis for inclusion in the final draft District Plan, with the content being finalised when the consolidated plan is presented in September 2016.

25 CHAIRMAN'S ANNOUNCEMENTS

The Panel Chairman welcomed Members, Officers and the public and reminded everyone that the meeting was being webcast.

She advised that further Panel meetings had been scheduled for 25 August, 8 September and 15 September 2016. Recommendations from the Panel would be considered by the Executive on 19 September 2016 and an Extraordinary Council meeting on 22 September 2016 would consider and

determine the District Plan for publication and a further six week consultation period.

The Chairman also detailed the dates of forthcoming meetings with parish and town councillors on 25 July, 30 August and 20 September 2016.

26 MINUTES

RESOLVED – that the Minutes of the meeting held on 24 May 2016 be approved as a correct record and signed by the Chairman.

The meeting closed at 8.05 pm

Chairman
Date

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 25 AUGUST 2016

REPORT BY LEADER OF THE COUNCIL

EAST HERTS DRAFT DISTRICT PLAN – NEW DRAFT CHAPTER 1 – INTRODUCTION

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

The purpose of this report is:

- To present to Members a new draft Chapter 1 (Introduction) for subsequent incorporation into the final draft District Plan.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:	
(A)	the draft revised Chapter 1 (Introduction), as detailed in Essential Reference Paper ‘B’ to this report, be agreed as a basis for inclusion in the final draft District Plan, with the content being finalised when the consolidated plan is presented in September 2016.

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.

1.2 The issues raised through the consultation with regard to the Chapter 1 Introduction were considered at the District Planning Executive Panel on the 21st July 2016.

1.3 This report presents a redrafted Chapter 1 which has been updated to present an up-to-date introduction to the Plan.

1.4 **Essential Reference Paper ‘B’** contains the revised draft chapter.

2.0 Report

2.1 Chapter 1 has been rewritten to present an up-to-date introduction to the District Plan.

2.2 The chapter explains what the District Plan is and refers the reader to the extensive evidence base that has informed the Plan. It also contains sections on the duty to co-operate and strategic planning, and sustainable development.

2.3 Members are invited to agree the revised chapter, as detailed in **Essential Reference Paper 'B'** to this report, as a basis for inclusion in the final District Plan, with the content being finalised when the consolidated plan is presented in September 2016.

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

Chapter 1 (Introduction) Issue Report – considered by the District Planning Executive Panel on the 21st July 2016

<http://democracy.eastherts.gov.uk/ieListDocuments.aspx?CId=151&MId=2951&Ver=4>

Contact Member: Cllr Linda Haysey – Leader of the Council
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Contact Officer: Kevin Steptoe – Head of Planning and Building Control
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Report Author: Claire Sime – Planning Policy Manager
claire.sime@eastherts.gov.uk

ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives:	Priority 1 – Improve the health and wellbeing of our communities Priority 2 – Enhance the quality of people's lives Priority 3 – Enable a flourishing local economy
Consultation:	The Report refers to the Draft District Plan consultation carried out between 27 th February and 22 nd May 2014.
Legal:	None
Financial:	None
Human Resource:	None
Risk Management:	None
Health and wellbeing – issues and impacts:	The 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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Chapter 1 Introduction

1.1 What is the District Plan?

- 1.1.1 The District Plan sets out the Council's planning framework for the district. It identifies how East Herts will grow and develop to become an even more desirable and prosperous place to live, work and visit. It covers the period 2011–2033 and consists of a Written Statement (this document) and a Policies Map. Once adopted, the policies in the District Plan will replace the policies in the Local Plan 2007.
- 1.1.2 The District Plan, together with the Minerals and Waste Local Plans for Hertfordshire and any adopted Neighbourhood Plans, form the Development Plan for the district. The Development Plan is the basis upon which planning applications will be determined, unless there are material planning considerations that indicate otherwise. The policies of the Plan should be read as a whole.
- 1.1.3 The District Plan is a long-term document which provides certainty to communities and businesses as to where development will be provided and, likewise, where precluding restrictions may apply. It also allows infrastructure providers to plan effectively for the future.
- 1.1.4 The District Plan should be read alongside policies set out in the National Planning Policy Framework (NPPF).

1.2 Content of this Document

- 1.2.1 The District Plan Written Statement is divided into three parts:
- **Part 1: Development Strategy** comprises Chapters 1-13 and includes the vision and strategic objectives, development strategy and settlement/site specific policies.
 - **Part 2: Development Management Policies** comprises Chapters 14-24 and contains the policies which will be used by the Council in the determination of planning applications.

- **Part 3: Delivery and Monitoring** contains policies on infrastructure and service delivery.

1.2.2 The Policies Map shows the main policy designations, such as Green Belt, housing allocations, employment areas, environmental assets, conservation areas and open spaces.

1.3 Evidence Base

1.3.1 The preparation of the District Plan has been informed by an extensive evidence base which is available to view on the Council's website at www.eastherts.gov.uk/technicalstudies.

1.3.2 The technical studies cover a range of topics including housing need and delivery, transport modelling, infrastructure requirements and economic development. A Sustainability Appraisal and a Habitats Regulations Assessment have also been undertaken.

1.4 Duty to Co-operate and Strategic Planning

1.4.1 The duty to co-operate was created in the Localism Act 2011 and places a legal duty on local planning authorities, county councils and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.

1.4.2 The Council has undertaken extensive engagement with a range of organisations including its neighbouring authorities and infrastructure providers throughout the preparation of the District Plan.

1.4.3 East Herts forms part of the London Stansted Cambridge Corridor (LSCC) core area which seeks to capitalise on the strategic locations of the corridor in order to promote economic growth and prosperity. The Council is working with partner authorities in the corridor to deliver the LSCC vision for the area.

1.4.4 The Council is also working, and will continue to work, with various other groups, including the Hertfordshire Infrastructure and Planning Partnership (HIPP) and the Co-operation for Sustainable Development Board.

1.5 Sustainable Development

1.5.1 The purpose of the planning system is to help achieve sustainable development. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the District Plan to perform a number of roles:

- an **economic role**: contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a **social role**: supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- an **environmental role**: contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

1.5.2 These roles are mutually dependent and as such should not be undertaken in isolation. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

1.5.3 In line with the requirements of the NPPF, the East Herts District Plan seeks to create sustainable communities which embrace the principles of sustainable development using a co-ordinated approach to the delivery of homes, jobs and infrastructure.

1.5.4 The NPPF also highlights the Government's desire to promote and support the delivery of growth. Local authorities are urged to work proactively with applicants and approve proposals wherever possible – where they accord with policies in the District Plan. If the Plan is silent or out of date, local authorities are urged to grant approval, having regard to whether any adverse effects would significantly outweigh the benefits, and other aspects of the NPPF. This approach has been termed a 'presumption in favour of sustainable development'. The Government has issued advice that a 'model policy' should be included within local plans, which reiterates national guidance. This policy is set out below.

Policy INT1 Presumption in Favour of Sustainable Development

I. The Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

II. Planning applications that accord with the policies in this District Plan (and, where relevant, policies in Neighbourhood Plans) will be approved without delay, unless material considerations indicate otherwise.

III. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise taking into account whether:

(a) Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole.

(b) Specific policies in the National Planning Policy Framework indicate that development should be restricted.

EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 25 AUGUST 2016

REPORT BY LEADER OF THE COUNCIL

EAST HERTS DRAFT DISTRICT PLAN – NEW DRAFT CHAPTER 2 – VISION AND STRATEGIC OBJECTIVES

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

The purpose of this report is:

- To present to Members a new draft Chapter 2 (Vision and Strategic Objectives) for subsequent incorporation into the final draft District Plan.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:	
(A)	the draft revised Chapter 2 (Vision and Strategic Objectives), as detailed in Essential Reference Paper 'B' to this report, be agreed as a basis for inclusion in the final draft District Plan, with the content being finalised when the consolidated plan is presented in September 2016.

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.

1.2 The issues raised through the consultation with regard to the Chapter 2 (Vision and Strategic Objectives) were considered at the District Planning Executive Panel on the 21st July 2016.

1.3 This report presents a redrafted Chapter 2. **Essential Reference Paper 'B'** contains the revised draft chapter.

2.0 Report

- 2.1 Chapter 2 sets out the overall strategic vision for development in East Herts over the Plan period to 2033. The vision is supported by a set of strategic objectives which when considered together provide the framework for the policies set out in the District Plan.
- 2.2 The chapter has been updated to take account of the issues raised during the Preferred Options Consultation. A new section has also been added to the chapter detailing the Council's commitment to working with partner authorities in the London Stansted Cambridge Corridor (LSCC) core area to deliver the LSCC strategic vision for the area up to 2050.
- 2.3 Members are invited to agree the revised chapter, as detailed in **Essential Reference Paper 'B'** to this report, as a basis for inclusion in the final District Plan, with the content being finalised when the consolidated plan is presented in September 2016.

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

Chapter 2 (Vision and Strategic Objectives) Issue Report – considered by the District Planning Executive Panel on the 21st July 2016

<http://democracy.eastherts.gov.uk/ieListDocuments.aspx?CId=151&MId=2951&Ver=4>

Contact Member: Cllr Linda Haysey – Leader of the Council
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Report Author: Claire Sime – Planning Policy Manager
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ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives:	Priority 1 – Improve the health and wellbeing of our communities Priority 2 – Enhance the quality of people's lives Priority 3 – Enable a flourishing local economy
Consultation:	The Report refers to the Draft District Plan consultation carried out between 27 th February and 22 nd May 2014.
Legal:	None
Financial:	None
Human Resource:	None
Risk Management:	None
Health and wellbeing – issues and impacts:	The 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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Chapter 2 Vision and Strategic Objectives

2.1 Introduction

2.1.1 This chapter sets out the overall strategic vision for development in East Herts over the Plan period to 2033. The vision is supported by a set of strategic objectives which, when considered together, provide the framework for the policies set out in the District Plan.

2.2 East Herts District

2.2.1 The District of East Herts covers an area of 477 km² (184 m²) and comprises around one third of the county of Hertfordshire. It is predominantly a rural district, with attractive towns and villages set in a rolling landscape. Topographically, the District is shaped like a hand with the principal rivers of the Lea, Mimram, Beane, Rib, Ash, and Stort forming the fingers and higher ground lying in-between.

2.2.2 East Herts has a dispersed settlement pattern that includes the five market towns of Bishop's Stortford, Buntingford, Hertford, Sawbridgeworth and Ware. Each of the towns provides a range of services to the surrounding rural area. There are also some hundred villages and hamlets of varying sizes.

2.2.3 Approximately the southern third of the District lies within the London Metropolitan Green Belt.

2.2.4 East Herts lies in the core area of the London Stansted Cambridge Corridor. The District is also heavily influenced by the presence of major settlements beyond its boundary. The three New Towns of Stevenage, Harlow and Welwyn Garden City are located immediately on the East Herts District boundary, and there is pressure for expansion of these settlements. There are also substantial cross-boundary influences from Cambridgeshire to the north and Essex to the east.

- 2.2.5 Historical development of the transport network has resulted in the District being largely bypassed by strategic road and rail corridors; with the M11 and the West Anglia Main Line between London and Cambridge to the east; and the A1(M) and East Coast Main Line to the west. The M25 London Orbital Motorway lies further to the south.
- 2.2.6 Within the District, the main road routes are the A10, which bisects the District roughly in half on a north-south axis; and the A414 in the south of the District, running on an east-west axis. The A120 also runs east-west from the A10 at Puckeridge to Bishop's Stortford and beyond, and the A602 links the A10 from Ware with the A1(M) in Stevenage. Stansted Airport, whilst outside the district, is immediately to the north-east of Bishop's Stortford and has strategic implications for the area.
- 2.2.7 The District contains many special landscape, natural and built heritage features including:
- 3 sites of international nature conservation
 - 1 National Nature Reserve at Broxbourne-Hoddesdonpark Woods
 - 1 Local Nature Reserve at Waterford Heath
 - 14 Herts and Middlesex Wildlife Trust Reserves
 - Several chalk streams which support special wildlife habitats and species
 - Over 40 Scheduled Monuments
 - Nearly 3,100 Listed Buildings
 - 42 Conservation Areas
 - 550 Areas of Archaeological Significance
 - 15 Registered Parks and Gardens of Special Historic Interest
 - 59 Locally Listed Historic Parks and Gardens

2.2.8 Residents in East Herts enjoy one of the highest qualities of life in rural Britain. In particular residents in East Herts enjoy a good level of health and life expectancy. Educational attainment is also high with students performing better in East Herts than the wider region.

2.3 Key Issues and Challenges

2.3.1 East Herts is an attractive and prosperous area. However, there are still a number of important issues and challenges facing the District. These are mainly related to challenges of managing high levels of growth and the effects of population increase. An overview of the key issues is set out below:

2.3.2 **Environment** – East Herts has a high quality environment, both within the towns and villages and in the countryside. The challenge is to ensure that this is recognised and protected whilst still allowing the necessary development to take place. It means protecting what is most important and ensuring that where new development takes place, it is of a high quality of design that takes account of its local setting. It is also about protecting the rich biodiversity in the District and responding to the challenge of climate change. This includes promoting sustainable development, both in terms of where it is located and how it is constructed.

2.3.3 **Economy** – Supporting a vibrant local economy and responding to the needs of businesses is another key issue. This means getting the balance right between the delivery of new housing on previously developed sites and ensuring there is enough employment land to meet current and future needs. It also means recognising and responding to the particular issues in East Herts, including the rural economy.

2.3.4 **Housing** – East Herts is an attractive place to live, which is reflected in high house prices. There is a pressing need for more affordable housing in the District. Achieving housing development that responds to local needs, whilst recognising the environmental and other constraints in East Herts, is a

significant challenge. It is also necessary to recognise the specific accommodation and housing needs of different groups in the local community.

- 2.3.5 **Infrastructure and Services** – It is important that the infrastructure and services needed to support new development are provided. This includes transport infrastructure, education provision, utilities such as water, wastewater and energy and improved broadband provision. The challenge is to ensure that these services and facilities are delivered alongside growth.
- 2.3.6 **Transport** – The District is predominantly rural with a dispersed population which creates challenges in providing a comprehensive public transport network. Many local communities are reliant on the private car as their only transport option. This impacts on carbon dioxide emissions, air quality, noise, public safety and the quality of the environment in towns and villages. The challenge is to ensure that development is directed to sustainable locations, to reduce the need to travel and, where journeys need to be made, the distance of those trips. Sustainable modes of transport are also encouraged to both reduce reliance on the car and promote healthier lifestyles.
- 2.3.7 **Population** – East Herts has an ageing population. Meeting the varying needs of older people will be a challenge, whilst ensuring that the district remains attractive and accessible to young people.
- 2.3.8 **Town Centres** – The District's market towns form the core of East Herts retail offer and their vitality and viability are critical to the success of the local economy. The challenge is to support the main town centres in East Herts, which are all different, all serve a particular purpose and all have particular needs.
- 2.3.9 **Rural Services** – The retention of local services is a key issue, particularly for rural communities. The challenge is to resist the loss of important facilities and to support the delivery of new ones. This will be especially important in the context of the

district's ageing population and the dispersed rural nature of the district.

2.3.10 **Cross Boundary Issues** – Understanding and taking account of the significance and impact of cross boundary issues is key. These include those developments planned outside East Herts but that will impact on the District. It also means considering how the developments planned within East Herts might impact on other areas.

2.4 Vision

2.4.1 Having identified the main planning challenges for the District, this section now sets out the vision for East Herts. The vision has been developed through public consultation and sets out what the Council would like the District to be like in 2033.

East Herts in 2033

1. The high quality environment of East Herts, its distinctive character and its economic prosperity will have been maintained.

2. New homes and jobs will have been provided through well designed and sustainable development. Local communities will have embraced Neighbourhood Planning to deliver their local objectives.

3. A range of sizes, types and tenure of new housing and accommodation will have been provided; including the provision of accessible and adaptable dwellings to meet the changing needs of occupants over their lifetime. There will be an increase in the overall stock of affordable housing including starter homes.

4. Working in partnership with other service providers, essential new and improved infrastructure to support the increased population of the District will have been delivered. Support will have been given to the retention of existing facilities and the provision of new facilities for leisure, recreation and cultural needs of the community. New development will have supported improved sustainable travel, including initiatives contained in Hertfordshire's 2050 Transport Vision. Mitigating

measures will have helped ameliorate congestion, particularly on the A414.

5. The local economy in the District will have been supported, with provision having been made for the accommodation requirements of existing and new businesses. Important employment assets will have been retained. The emphasis will have been on sustainable economic development, of the right type and in the right place to meet employment needs both within the towns and in the rural areas.

6. The vitality and viability of the main towns of Bishop's Stortford, Buntingford, Hertford, Sawbridgeworth and Ware will have been safeguarded in a way that takes account of their distinctive roles. This will have been achieved through carefully planned development, which meets the needs of these centres, whilst recognising the importance of preserving and enhancing their historic character. In local and village centres shopping facilities that meet local needs will have been supported.

7. Outside of the main settlements, strategic development will have been accommodated to the east of Stevenage, east of Welwyn Garden City and in the Gilston Area. These areas will have provided a range of homes, schools, facilities and services for the benefit of East Herts residents.

8. The rich heritage of historic buildings, features and archaeology in the District will have been protected and enhanced. The attractive landscape of East Herts, which contributes to its distinctive character, will have been conserved and enhanced.

9. New building will have contributed to the creation of sustainable communities, which are safe, attractive and inclusive and where the design of new development makes a positive contribution to the area in which it is located.

10. The rich biodiversity of East Herts will have been protected and enhanced. Where new development could potentially have an adverse effect on biodiversity and the ecological network of the District, measures will have been taken to ensure that the impact was either avoided or mitigated.

11. The District's rich and varied green infrastructure centred in the river valleys will have been re-connected and enhanced and its multi-functionality protected providing increased resilience to changing climates, improved ecological connectivity and new spaces for recreation and leisure.

12. East Herts will be more sustainable through measures to combat the effects of climate change. This will have been achieved by locating new buildings in the most sustainable locations so as to reduce car dependency and by ensuring through their design and construction, new buildings produce lower carbon emissions.

13. Measures will have been taken to adapt to the effects of climate change, which will have included steps to minimise the risk of flooding and reduce the demand for water as well as supporting the adaptation of buildings to cope with extremes of heat and cold in an energy efficient manner.

2.5 Strategic Objectives

2.5.1 The following strategic objectives are the stepping stones to deliver the vision and form the basis of the policies contained in the District Plan.

Strategic Objectives

1. To mitigate the effects of climate change by reducing carbon dioxide emissions, supporting decentralised, low carbon and renewable energy and reducing the risk of flooding.

2. To encourage safe and vibrant mixed communities that provide for the needs of all East Herts residents including the young, the elderly and vulnerable people.

3. To balance the housing market by delivering a mix of market, low cost, and affordable homes and accommodating the housing needs of an ageing population.

4. To protect the countryside from inappropriate development and to protect and enhance the historic environment of East Herts, promoting good design that creates a distinctive sense of place.
5. To foster entrepreneurial endeavour through educational attainment and encourage small and medium enterprises through maximising existing employment opportunities and clusters and supporting rural diversification.
6. To improve access opportunities, minimise the need to travel, and encourage necessary journeys to be made by sustainable means to ease congestion and help reduce East Herts' carbon footprint.
7. To meet the needs of all of East Herts' communities by maintaining and improving existing facilities and providing new facilities including for arts, culture, community, leisure, entertainment, recreation, faith and health.
8. To reduce water consumption, increase biodiversity and protect and enhance the quality of existing environmental assets by, *inter alia*, creating new green spaces and networks of high quality green space for both recreation and wildlife.
9. To ensure that development occurs in parallel with provision of the necessary infrastructure, including enhancement and provision of green infrastructure.

2.6 London Stansted Cambridge Corridor (LSCC) Vision

- 2.6.1 The Councils of Broxbourne, East Herts, Epping Forest, Harlow and Uttlesford form the LSCC Core Area which lies at the heart of the London Stansted Cambridge Corridor (LSCC). This corridor has, over the past decade or more, been the engine of UK growth with its world class industries and businesses.
- 2.6.2 Over the past five years the Corridor's dynamic, knowledge-based economy has grown at a rate almost double that of the UK average and as a result rates of population growth have increased. Transport links are excellent; with two major rail

routes - the East Coast and West Anglia main lines - serving the Corridor. The A1(M), A10 and M11 motorways link its towns and cities with the capital, while London Stansted Airport offers international connections.

2.6.3 With a significant number of jobs in knowledge-based industries, the Corridor is a leading knowledge economy and a showcase for tech industries and firms. There is a high rate of innovation.

2.6.4 The Corridor accounts for 24,700 jobs in the life sciences sector contributing 11% of all national employment. This success is built on research institutes and notable firms and organisations, including Amgen and AstraZeneca in Cambridge, GlaxoSmithKline in Stevenage, and Public Health England in Harlow.

2.6.5 The continued success of the Corridor as a great place to live, work, do business and visit provides the opportunity for the Core Area to deliver greater and lasting prosperity for its residents and businesses. As such the Council is working with its partner authorities in the Core Area to deliver the following LSCC strategic vision for the area up to 2050:

Vision for the London Stansted Cambridge Corridor Core Area

The Core Area will build on its key strengths including its skilled workforce in sectors such as health, life sciences and pharmaceuticals, advanced engineering and aerospace, its high quality environment and educational opportunities. Together with Stansted Airport, the local authorities will deliver sustainable growth which supports the economic ambitions of the LSCC and the UK through:

- complementing and supporting the economic performance of the Corridor whilst maintaining and enhancing the special character of the area, including the locally distinctive historic character of its market towns and rural settlements;

- the delivery of housing, supported by good access to social, leisure, community, health facilities, education and jobs, that meets the needs of local people and supports sustainable economic growth, whilst ensuring it remains an attractive place for people to live and locate to;
- capitalising on existing economic sectors and promoting growth of expanding industries including in the food production, life sciences, pharmaceuticals and technology sectors; tourism including hotels, Stansted's expansion, recreation/green assets including the Lee Valley, Stort Valley, Epping Forest and Hatfield Forest National Nature Reserve;
- working with partners to protect and enhance the high quality environment, its unique landscapes and places of special wildlife value. This would be achieved by place-shaping initiatives which would include measures to conserve areas of high biodiversity; the provision of new, alternative green spaces for people and wildlife; and the increase of green infrastructure connections between these areas, to provide greater opportunities for more sustainable access to nature for everyone living in the corridor;
- working with partners to secure investment in major infrastructure including increasing rail capacity on the West Anglia Mainline and maximising the opportunities that Crossrail 2 can deliver, together with road improvements including a new junction on the M11 at 7A and improvements to junctions 7 and 8, and to the A414, A120, A10 and M25; and delivery of superfast broadband;
- supporting the delivery of new jobs in the Harlow Enterprise Zone, and the north side of Stansted Airport, Broxbourne Park Plaza, Brookfield and Bishop's Stortford – all identified as Strategic Opportunity Sites within the corridor; and
- the regeneration of existing urban areas including at Harlow, Waltham Abbey, Loughton and Waltham Cross.

The Core Area supports the development and sustainable growth of Greater Harlow and key growth locations at Broxbourne, Brookfield and Bishop's Stortford together with Stansted Airport growing to its full permitted capacity and as a business growth hub. These centres, with proportionate growth throughout the wider area, and the right investment, would create an economic powerhouse.

Putting in place these critical building blocks will provide the foundations for looking further ahead to 2050. Certainty through further investment and delivery of key infrastructure, including in the West Anglia mainline, Crossrail 2, the M11 junctions, M25 junctions, A414, A120 and A10 is a vital component of this.

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 25 AUGUST 2016

REPORT BY LEADER OF THE COUNCIL

EAST HERTS DRAFT DISTRICT PLAN – CHAPTER 3 – DEVELOPMENT STRATEGY: RESPONSE TO ISSUES RAISED DURING PREFERRED OPTIONS CONSULTATION

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

The purpose of this report is:

- To bring to Members' attention the issues raised through the Preferred Options consultation in connection with Chapter 3 (Development Strategy) of the Draft District Plan Preferred Options version, together with Officer responses to those issues.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:	
(A)	the issues raised in respect of Chapter 3 (Development Strategy) of the Draft District Plan Preferred Options, as detailed at Essential Reference Paper 'B' to this report, be received and considered; and
(B)	the Officer response to the issues referred to in (A) above, as detailed in Essential Reference Paper 'B' to this report, be agreed.

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.

1.2 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.

1.3 This report presents the Issue Report for the Development Strategy chapter at **Essential Reference Paper 'B'**.

2.0 Report

2.1 The Issue Report summarises the issues raised through the Preferred Options Consultation and the issues are grouped according to the section of the Draft Plan they relate to. The table presents an officer response to each issue and then sets out whether or not it is proposed that any subsequent proposed amendments to the text or policies of the draft Plan be made as a result.

2.2 As there have been significant advances in the technical evidence available to support the development strategy, and changes in local and wider circumstance since the publication of the Preferred Options version of the Draft Plan, it is considered appropriate that the Development Strategy chapter be rewritten to take these factors into account rather than presenting a 'track change' iteration of the previous version. Therefore, unlike the approach taken for the Topic Chapters, the Issue Report for this chapter does not specify a form of wording that any proposed amendment should take.

2.3 In consequence, it is likewise not proposed that amendments are shown in the form of 'track changes'. Instead, a revised chapter, which incorporates any proposed necessary amendments to the Plan identified in the Issue Report, will be brought before Members for consideration at the District Planning Executive Panel meeting on 8th September.

2.4 Of particular note is the Officer response made to Issue number 3.02 and others concerning objectively assessed housing need. A Strategic Housing Market Assessment (SHMA) was presented to this Panel in October 2015. The SHMA, which was prepared by independent consultants on behalf of the four authorities that

comprise the West Essex/East Herts housing market area, identified a District wide need for 745 new homes per year, equating to 16,390 new homes by 2033. Over the last few months work on the District Plan has progressed on the basis of this objectively assessed housing need figure.

- 2.5 On 12th July 2016, the Government published updated 2014 based household figures. Officers are therefore currently working with our housing market area partners in order to understand how this new data impacts on the assessment of objectively assessed housing need.
- 2.6 Members should also be aware that a large number of responses made to the Development Strategy chapter related to specific sites. In order to avoid repetition, these comments have been addressed within the relevant settlement chapters.
- 2.7 Members are therefore invited to agree the Issue Report, as detailed in Essential Reference Paper 'B' to this report, as a basis for informing a redrafted chapter on the Development Strategy in the final 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:	Priority 1 – Improve the health and wellbeing of our communities Priority 2 – Enhance the quality of people's lives Priority 3 – Enable a flourishing local economy
Consultation:	The Report refers to the Draft District Plan consultation carried out between 27 th February and 22 nd May 2014.
Legal:	None
Financial:	None
Human Resource:	None
Risk Management:	None
Health and wellbeing – issues and impacts:	The Pre-Submission 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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Issue Number	Issues raised through consultation	Officer Response
General Issues		
3.01	Parish Councils, community groups and others stress opposition to development on green belt land. Development should be directed to the two-thirds of the District that is not green belt. EHC have not portrayed the exceptional circumstances required for green belt release. Brownfield sites and windfall should be used. Planners need to say when it is not possible to reach the government requirements.	<p>No amendment to Plan in response to this issue</p> <p>The Council has tried to utilise brownfield land as far as possible but only a small proportion of the housing need can be met in this way. Greenfield development is therefore necessary in order to meet identified housing needs. The Council could adopt a strategy whereby no Green Belt land is released, however this would result in having to provide significantly more development within the more rural area to the north of the District which is not considered to be a sustainable approach.</p> <p>Housing need does represent the exceptional circumstances required to review the Green Belt. This was confirmed by a Planning Inspector during an advisory visit to the Council in early 2016.</p>
3.02	A number of local people including Town and Parish Councils and Civic Societies expressed concerns that the level of housing proposed is too high. The figures of 15,000 (total) and 750 (per year) should be reduced. Justifications for these totals are contrary to national policy. NPPF says that LPAs must “seek” to meet housing targets, to the extent other policies allow.	<p>No amendment to Plan in response to this issue</p> <p>A Strategic Housing Market Assessment (SHMA) has been prepared by independent consultants on behalf of the four local authorities that comprise the housing market area. The SHMA indicates that the objectively assessed housing need in East Herts is for 16,390 new homes up to 2033. The 2014 based household projections were published by the Government on 12th July 2016. The Council is currently working with its housing market area partners in order to understand how this data impacts on the assessment of objectively assessed housing need.</p> <p>The Council has always sought to prepare a Plan which meets the full objectively assessed housing needs of the District. Unless there is clear justification for doing so, submitting a Plan that does not meet full objectively assessed needs is highly likely to be found ‘unsound’ at Examination.</p> <p>Only the lower third of the District is within the Green Belt. The Council could adopt a strategy whereby no Green Belt land is released, however this would result in having to provide significantly more development within the more rural area to the</p>

		north of the District which is not considered to be a sustainable approach.
3.03	A number of landowners, developers and planning agents expressed concerns that the housing target of 15,000 is too low, taking account of the requirements of the NPPF and requirements of the Planning Inspectorate at the examination of Local Plans. EHC cannot demonstrate a 5 year housing supply. Some have suggested figures should be altered to 16,900, with 845 dwellings to be built per year. A green belt review may be required.	<p>No amendment to Plan in response to this issue</p> <p>A Strategic Housing Market Assessment (SHMA) has been prepared by independent consultants on behalf of the four local authorities that comprise the housing market area. The SHMA indicates that the objectively assessed housing need in East Herts is for 16,390 new homes up to 2033. The 2014 based household projections were published by the Government on 12th July 2016. The Council is currently working with its housing market area partners in order to understand how this data impacts on the assessment of objectively assessed housing need.</p> <p>It is acknowledged that in order to meet this challenging level of housing need, some carefully planned development on existing Green Belt land will be required.</p>
3.04	A number of landowners, developers and planning agents suggest that EHC should take account of the under-provision of homes in London, as all south-east authorities have been advised by the Greater London Authority (GLA).	<p>No amendment to Plan in response to this issue</p> <p>The SHMA includes assumptions regarding internal migration from London to the four authority areas that comprise the East Herts/West Essex housing market area. However, it does not seek to provide for any under-supply in housing within London.</p> <p>The Greater London Authority is currently in the early stages of a full review of the London Plan which will identify how their housing need will be met. If there continues to be an under-supply of housing in London it is not clear at this stage how this would be addressed within the wider south east region. It is therefore not an issue which can be considered through the emerging East Herts District Plan.</p>
3.05	Great Amwell Parish Council support the approach outlined in the plan. However, they would not wish to see any development that has an adverse impact on any adjoining area or areas within the District.	<p>No amendment to Plan in response to this issue</p> <p>The District Plan seeks to provide for the full objectively assessed needs of East Herts in a sustainable manner. The strategic importance of the Green Belt in the area of Great Amwell is noted, given that it performs a vital role in preventing the coalescence of various settlements including Great Amwell, Ware, Stanstead Abbots and St. Margaret's and Hoddesdon.</p>
3.06	North Herts District Council considers that East Herts Council should consider the potential long-term unmet needs arising	No amendment to Plan in response to this issue

	from Stevenage, and options within East Herts to address these unmet needs. North Herts may not be in a position to accommodate all the development associated with those needs.	The Council has liaised regularly with Stevenage Borough Council throughout the plan making process as part of the Duty to Co-operate. Stevenage Council recently published a Pre-Submission version of their Local Plan which seeks to meet their objectively assessed housing needs in full.
3.07	The plan fails to take account the effect the proposals would have on farmland. NPPF states that agricultural land should be protected. The UK still has to produce its own food.	No amendment to Plan in response to this issue The NPPF does encourage local planning authorities to avoid development of good quality agricultural land wherever possible. However, much of the agricultural land in East Hertfordshire is regarded as being of high quality. It would therefore not be possible for the District to meet its substantial level of housing need without some carefully planned development on higher quality land.
3.08	Continual development will increase the risk of flooding.	No amendment to Plan in response to this issue New developments will need to include sustainable drainage measures in accordance with the Council’s Strategic Flood Risk Assessment which will decrease the risk of flooding rather than exacerbate it. In addition, development proposals would need to demonstrate that drainage issues had been adequately addressed at the planning application stage.
3.09	What type of housing will be built? Will the housing be built for people working in London or will there be housing available for young people to rent? There does not seem to be provision for self-build homes.	No amendment to Plan in response to this issue New development in East Herts will provide for a mix of housing to help meet different needs in accordance with District Plan Policy HOU1. This includes provision for affordable housing, including starter homes, and self-build housing.
3.10	Natural England state that all development locations should “provide quality green infrastructure through the site including opportunities for preserving and enhancing on-site assets, maximising opportunities to link existing assets and enhance biodiversity”.	No amendment to Plan in response to this issue Noted and agreed. The District Plan requires sites to deliver green space and green infrastructure. The level of provision is a detailed issue which will be addressed at the planning application stage.
3.11	HCC comments that the timing/phasing of sites needs to take into account provision of infrastructure, in particular school places. School accommodation needs to be phased with proposed housing to avoid difficulties in providing school places.	No amendment to Plan in response to this issue Noted. The Council has worked closely with the County Council throughout the plan making process, including the education team, in order to ensure that infrastructure is delivered and phased appropriately. Requirements for new or expanded schools are identified within the Infrastructure Delivery Plan (IDP).

3.12	Dislike the NPPF. There is a conflict between the NPPF and the Localism Act. The NPPF acts as national guidance which LPAs should measure their planning performance, whilst the Localism Act looks to give powers to local people, this is contradictory. Elected Members should take a stand against unsustainable development.	<p>No amendment to Plan in response to this issue</p> <p>Legally, East Herts must produce a District Plan which is in conformity with national policy. This test will form part of the Examination in Public in due course in order to ensure that the Plan is ‘sound’ and therefore fit for purpose.</p>
3.13	Landowners, developers and planning agents believe that there is not enough consideration of cross boundary issues. East Herts need to abide by the “Duty to cooperate” and demonstrate engagement with neighbouring authorities. It would be useful if the plan provided details on what cross boundary issues have shaped the plan. There is no evidence of co-operation with Welwyn and Hatfield Borough Council (East of WGC) and Harlow Council (Gilston). Housing targets may need to be re-assessed taking into account unmet needs of neighbouring authorities.	<p>No amendment to Plan in response to this issue</p> <p>East Herts Council is part of the Co-operation for Sustainable Development Group which was set up in order to address cross boundary issues within the housing market area (comprising East Herts, Epping Forest, Harlow and Uttlesford Councils). Three separate Memoranda of Understanding are currently being prepared which will demonstrate that all relevant authorities are in agreement on strategic issues including the distribution of housing need across the housing market area, the provision of strategic transport infrastructure, and the protection of Epping Forest Special Area of Conservation.</p> <p>East Herts has also pro-actively engaged with other neighbouring authorities on strategic issues. The Council will also seek to agree Memoranda of Understanding with these authorities before submitting the District Plan to the Planning Inspectorate in March 2017.</p>
3.14	Local Plans should provide certainty to investors, developers and the public about where and what development will take place. This is not carried through the District Plan.	<p>No amendment to Plan in response to this issue</p> <p>The emerging District Plan proposes allocating a number of sites in order to meet the challenging level of housing need within the District. The proposed locations for development are clearly identified on the Policies Map which accompanies the Plan.</p>
3.15	Development in Buntingford is artificially restricted for political reasons and this is inadequate. EHC has not given consideration to non-green belt allocations in settlements such as Buntingford. These sites offer the chance to reduce impact on green belt. Land south of Hare Street Road should be allocated.	<p>No amendment to Plan in response to this issue</p> <p>The District Plan Preferred Options document proposed allocating land to the north and south of the town for a total of 480 new homes. These sites have subsequently received planning permission.</p> <p>Planning permission for land south of Hare Street Road has also been granted on appeal, along with other sites on the edge of Buntingford.</p>

3.16	The Draft District Plan fails to make adequate proposals to safeguard the market-town, rural nature of the District.	<p>No amendment to Plan in response to this issue</p> <p>The District Plan seeks to provide for the challenging level of housing need in a way that protects the character of the District as far as possible. A significant proportion of new development will take place in areas outside of the District's towns including the Gilston Area, East of Stevenage and East of Welwyn Garden City.</p>
3.17	Development should be directed to locations where people are not able to use the countryside for enjoyment. Areas with no footpaths or bridleways would be appropriate. An example of this could be land between the village of Westmill and the A10.	<p>No amendment to Plan in response to this issue</p> <p>The impact of development on public rights of way has been considered through the plan making process. However, given its relative isolation and lack of services, Westmill is not considered to be a sustainable location for significant new development.</p>
3.18	Widbury Residents Association comments that the only way to protect any proposal is too compulsorily purchase the land required at current market value. Otherwise EHC will be agreeing to compromises with developers.	<p>No amendment to Plan in response to this issue</p> <p>The UK planning system allows for an uplift in land value to reflect proposed uses. It is noted that this often leads to significant profits for landowners and effectively reduces the amount of money that can be spent on infrastructure, however this is not an issue that the District Plan can resolve.</p>
3.19	More consideration needs to be given to the cumulative impact. Development should be shifted to the North of England or derelict areas in London.	<p>No amendment to Plan in response to this issue</p> <p>The cumulative impact of development, including areas outside of East Herts, is an important principle of plan making and has been considered in a number of ways. In particular, the Council has worked with Essex and Hertfordshire County Councils in order to undertake transport modelling which identifies where mitigation measures are required to help facilitate growth across the wider sub-region.</p> <p>National planning policy is clear that local planning authorities must seek to plan for their full objectively assessed needs.</p>
3.20	Brownfield sites within the towns should not only be developed for mixed-use schemes. Some of these sites can make greater contribution to housing needs.	<p>No amendment to Plan in response to this issue</p> <p>It is considered important, where town centre or edge of centre brownfield sites are available for re-development, that they provide a mix of uses, including employment, in order to support the needs of current and future residents.</p>

3.21	McMullen & Sons limited would like to see a District Plan that facilitates the long term development of pubs, particularly those in the rural area. Many of the pubs will require growth and adaptation to cater for developments proposed (convert to food-led operations). Support is portrayed for many of the residential developments.	<p>No amendment to Plan in response to this issue</p> <p>Draft policy CFLR7 allows for limited extensions and alterations to community facilities where doing so would not conflict with other policies in the Plan.</p>
3.22	Environment Agency supports the use of brownfield sites.	<p>No amendment to Plan in response to this issue</p> <p>Noted. Given the rural nature of East Herts there are very few brownfield sites that are available for re-development. However, the District Plan does seek to bring such sites forward for development, including the Goods Yard in Bishop's Stortford and the Mead Lane area of Hertford.</p>
3.23	Bishop's Stortford Civic Federation and others believe that development should be directed to villages, in particular the better served ones. This could decrease the pressure on the urban areas/urbanised corridors.	<p>No amendment to Plan in response to this issue</p> <p>The level of housing need in the District is significant. In order to meet this requirement, a number of sites are proposed for allocation across the District, including on the edge of larger settlements such as Harlow, Welwyn Garden City and Stevenage. In addition, the Plan seeks to deliver a limited amount of development in village locations, to be delivered primarily through the preparation of Neighbourhood Plans.</p>
3.24	It is logical to prioritise developed land and greenfield sites first and then bring forward broad locations after DPDs have been adopted.	<p>No amendment to Plan in response to this issue</p> <p>It is now the view of Officers that the three sites that were previously identified as Broad Locations within the Preferred Options version of the District Plan should be allocated. There would therefore not be a need to prepare future DPDs.</p>
3.25	There seems to be no consideration of Aston and the area adjacent to Stevenage in the Plan.	<p>No amendment to Plan in response to this issue</p> <p>The Supporting Document, which informed the District Plan Preferred Options document, did consider the potential for strategic scale development to the east of Stevenage. It was discounted at that stage, largely on the basis that development of that scale would have a significant negative impact on the environment of the Beane Valley.</p> <p>Given the challenging level of housing need, and in particular a need to ensure sufficient housing is delivered within the first five years of the plan period, further</p>

		consideration has been given to a smaller scale of development in that location. As a result, it is now the view of Officers that a site to the east of the town should be allocated for approximately 600 homes and a primary school.
3.26	Thames Water comments that water/wastewater infrastructure is easier provided for a small number of large sites as opposed to a larger number of small sites.	No amendment to Plan in response to this issue Noted. The District Plan proposes the allocation of a number of large sites in order to help provide for the challenging level of housing need in the District. This strategy helps to ensure that the provision of new infrastructure can be maximised.
3.27	Uttlesford District Council has no specific objections to any of the sites or policies proposed, but does have concerns regarding the cumulative impact on <ul style="list-style-type: none"> 1) London Stansted Airport in terms of overflying the area and also in terms of its transport impact on the M11 and rail network and potential future growth. 2) Joint impact on the A120 and M11 junctions. 3) Cross border movements of pupils for primary and secondary education. 4) Joint impact on the Bishop’s Stortford Waste Water Treatment Works (within Uttlesford) and outfall to the River Stort. <p>It is therefore proposed to continue to work closely together to address these issues.</p>	No amendment to Plan in response to this issue Both authorities are part of the Co-operation for Sustainable Development Group which was set up in order to address cross boundary issues within the housing market area. These issues have been addressed through this forum. In particular, a Memorandum of Understanding (MoU) is being prepared, which will be signed by Highways England, Essex and Hertfordshire County Councils and the four local authorities that comprise the housing market area (including East Herts). The MoU will confirm that the respective authorities will work collaboratively to identify, develop and deliver highway infrastructure schemes in order to support housing growth. Hertfordshire and Essex County Councils have also been engaged on education matters, while Thames Water is satisfied that waste water infrastructure has sufficient capacity to cope with the level of growth envisaged across the wider area.
Introduction		
3.28	Growth on any scale is not sustainable, the councils references to sustainability in the Introduction is very muddled. The council should make it clear that it will follow the government’s growth agenda only because it is legally bound to, not because it is the wish of the people of East Herts.	No amendment to Plan in response to this issue The Council is legally required to seek to meet its full objectively assessed housing needs. However, development can bring significant benefits, for example, through the provision of affordable housing, jobs, new services and facilities and green space.
Policy DPS1: Housing, Employment and Retail Growth		

3.29	Paragraph 3.2.3 should be amended to reflect that infrastructure capacities do not limit growth. 3.2.3 seems to contradict paragraph 3.3.4.	<p>No amendment to Plan in response to this issue</p> <p>It is not agreed that there is a contradiction between the two paragraphs. The Council is required to seek to meet its objectively assessed housing needs. However, in formulating the development strategy, regard must be had to infrastructure capacity in order to ensure that services and facilities can cater for anticipated levels of growth.</p>
3.30	The projections utilised in paragraph 3.2.4, should be challenged as projections simply assume the continuation of what has gone before. There is no logical reason why it should be assumed that growth will continue at the same rate.	<p>No amendment to Plan in response to this issue</p> <p>A Strategic Housing Market Assessment (SHMA) has been prepared by independent consultants on behalf of the four local authorities that comprise the housing market area. The methodology for assessing housing need is in accordance with national guidelines.</p>
3.31	Object to 3.2.7 as there are plenty of industrial/warehouse locations with long term “for sale or to let” signs present. There is no need to secure additional greenfield sites.	<p>No amendment to Plan in response to this issue</p> <p>The Council has tried to utilise brownfield land as far as possible but only a small proportion of the housing need can be met in this way. Greenfield development is therefore necessary in order to meet identified housing needs.</p> <p>It is also a priority for the Council to maintain sites that are currently in employment use wherever possible unless it can be demonstrated that such uses are now longer required or viable.</p>
3.32	A number of landowners, developers and planning agents object to 3.2.10 and state that East Herts must use up to date market analysis to assess employment sites. Simply retaining all previous employment sites fails to take into account changing circumstances. All employment areas and other safeguards to development should be reviewed.	<p>No amendment to Plan in response to this issue</p> <p>The Council has up to date evidence which confirms that all sites currently in employment use should be retained.</p>
3.33	“District centres” are proposed within urban extensions as opposed to neighbourhood centres/parades that are stated in 3.2.15.	<p>No amendment to Plan in response to this issue</p> <p>Neighbourhood centres and local parades will be provided as part of larger developments in order to serve local communities without competing with services and facilities within town centres.</p>

<p>3.34</p>	<p>The Bishop’s Stortford Civic Federation states that it is not in a position to challenge the 15,000 additional homes. However since half the District’s population growth in the recent past has resulted from net inward migration and this is supposedly part of the housing ‘need’ to be met, we suggest that the Council look again at that element of population projection and how it might vary according to the choice of baseline from which to project the trend and how it might be modified by altering the future distribution of housing compared to the past.</p>	<p>No amendment to Plan in response to this issue</p> <p>A Strategic Housing Market Assessment (SHMA) has been prepared by independent consultants on behalf of the four local authorities that comprise the housing market area. The SHMA indicates that the objectively assessed housing need in East Herts is for 16,390 new homes up to 2033. The methodology for assessing housing need is in accordance with national guidelines.</p> <p>The 2014 based household projections were published by the Government on 12th July 2016. The Council is currently working with its housing market area partners in order to understand how this data impacts on the assessment of objectively assessed housing need.</p> <p>Policy DPS1 needs to be updated to reflect the SHMA figure.</p>
<p>3.35</p>	<p>It is highly unlikely that 30% or 40% affordable housing will be achievable and therefore the only mechanism to properly address affordability will be to increase the supply of housing.</p>	<p>No amendment to Plan in response to this issue</p> <p>Not agreed. The Delivery Study, which forms part of the Council’s evidence base, concluded that it is financially viable to provide 30 – 40% affordable housing for the majority of housing site typologies.</p>
<p>3.36</p>	<p>Welwyn Hatfield Borough Council is concerned that in deriving the District Plan’s housing target, EHDC does not appear to have taken into account provision for all the housing market areas covered by East Hertfordshire. Welwyn Hatfield Council objects policy to DPS1 as it makes no allowance for any unmet need arising in Welwyn and Hatfield.</p>	<p>No amendment to Plan in response to this issue</p> <p>Since the Preferred Options consultation, Strategic Housing Market Assessments (SHMA’s) covering the relevant Housing Market Areas (HMA’s) have been completed. There is a degree of overlap between the various HMAs and regard should be had to needs arising in all neighbouring areas. However, Welwyn Hatfield Council has not asked East Herts for assistance in meeting its housing needs.</p>
<p>3.37</p>	<p>In recent years the demand for housing has outstripped the supply. The outcome of this has been a significant increase in housing prices.</p>	<p>No amendment to Plan in response to this issue</p> <p>Noted. The undersupply of housing provided in East Herts in recent years has been taken into account in identifying the objectively assessed housing need figure for the District. In addition, as there has been a consistent undersupply, a 20% buffer has been added to the housing target in the first 5 years, which has been brought forward from later in the plan period in accordance with national policy.</p>

3.38	It is essential that additional retail floorspace is delivered in the town centres e.g. Hertford. This should be done by positive plan allocations.	<p>No amendment to Plan in response to this issue</p> <p>The Councils evidence base indicates that there is a relatively modest need for new comparison and convenience floorspace in the District. The District Plan does not seek to allocate sites for new retail space. However, the policies contained in the plan are sufficiently flexible to allow the provision of additional provision in appropriate locations. In respect of Hertford, this issue has been addressed by the Town Centre Urban Design Strategy.</p>
3.39	CPRE Hertfordshire and others raised concerns that the housing target of 15,000 was attained by utilising the 2013 interim household projections. It is highlighted that these figures are considered projections rather than forecasts, therefore the robustness is questioned. This data source is also out-dated; so the housing target should be reviewed.	<p>No amendment to Plan in response to this issue</p> <p>A Strategic Housing Market Assessment (SHMA) has been prepared by independent consultants on behalf of the four local authorities that comprise the housing market area. The SHMA indicates that the objectively assessed housing need in East Herts is for 16,390 new homes up to 2033.</p> <p>The 2014 based household projections were published by the Government on 12th July 2016. The Council is currently working with its housing market area partners in order to understand how this data impacts on the assessment of objectively assessed housing need.</p>
3.40	CPRE Hertfordshire suggests that the windfall figures in the draft are far too low. Changes to permitted development rules mean these figures are out of touch. Under the new regulations farm buildings and office premises can be converted to flats/houses without planning permission. This is a form of windfall growth which could reduce the reliance on Greenfield sites.	<p>No amendment to Plan in response to this issue</p> <p>The windfall figures included within the Development Strategy have been based on recent trends. The Council must positively plan for the housing need in the District and it is highly unlikely that relying on windfall for a significant part of that need would be considered a 'sound' approach at Examination.</p>
3.41	Various respondents question how 9,700 jobs will be delivered in East Herts, while a number of others are concerned that 9,700 is too low. 2013 EEFM projections suggest a need for 11,200 jobs.	<p>Proposed amendment to Plan in response to this issue</p> <p>In order to create sustainable communities it is important to provide sufficient jobs alongside significant housing growth. The Economic Development Chapter contains policies that seek to support the delivery of new employment space. However, it is recognised that the figure of 9,700 jobs as identified by Policy DPS1 is out of date and will need to be updated to reflect the most recent evidence.</p>

Policy DPS2: The Development Strategy 2011 - 2031		
3.42	The guiding principles are too general for an area so diverse in character.	<p>No amendment to Plan in response to this issue</p> <p>It is acknowledged that East Herts is a large, diverse District. However, it is considered that the ten guiding principles have provided a sound basis on which to prepare the District Plan.</p>
3.43	There is no mention of education in the guiding principles.	<p>No amendment to Plan in response to this issue</p> <p>The guiding principles relate to the spatial strategy specifically. Education capacity is important and is addressed in other parts of the plan as well as the Infrastructure Delivery Plan.</p>
3.44	An additional guiding principle should be added seeking high quality design and conservation of heritage assets.	<p>No amendment to Plan in response to this issue</p> <p>The guiding principles relate to the spatial strategy specifically. Whilst high quality design and conservation are important, they are addressed elsewhere in the plan.</p>
3.45	Insert additional guiding principle to protect the green belt and to ensure that its boundaries are altered only in exceptional circumstances.	<p>No amendment to Plan in response to this issue</p> <p>Principle 9 is “To protect and enhance the rural area and the Green Belt outside the allocated development areas to preserve the countryside and the rural character of the District.”</p>
3.46	Bishop’s Stortford Civic Federation and others suggest that Principle 1 should be modified to emphasize that the first priority ought to be to meet the naturally arising demand in each settlement (rather than the housing market area) and that catering for inward migration should be a secondary objective – not part of the primary housing requirement, since the plan itself can influence how and where such secondary demand is met.	<p>Proposed amendment to Plan in response to this issue</p> <p>Work on housing need at the local level was undertaken in order to inform the Preferred Options document. This suggested that the level of need arising from certain locations in the District could not be met in those areas, and therefore, this need could primarily be met by development in the Gilston Area.</p> <p>However, the updated SHMA does not identify need at a level that is smaller than District level – the level of need for East Herts is 16,390 dwellings by 2033. The 2014 based household projections were published by the Government on 12th July 2016. The Council is currently working with its housing market area partners in order to understand how this data impacts on the assessment of objectively assessed housing need.</p>

		Guiding Principle 1 should be updated to reflect this.
3.47	Principle 3 should be amended to read “.....to services and facilities with identified available capacity or immediate ability to be expanded to meet the growth in demand, and which reflect....”	<p>No amendment to Plan in response to this issue</p> <p>The guiding principles relate to the spatial strategy specifically. Proximity is important because it encourages use of services and facilities without use of the car, alleviating congestion and supporting place-making. Capacity is also important and is addressed extensively in other parts of the plan, in particular through the Infrastructure Delivery Plan.</p>
3.48	The Bishop’s Stortford Civic Federation believes that Principle 3 is flawed. The plan should be looking ahead to how settlements will evolve in the future and aim for sustainability across the generations. As drafted, this principle simply looks backwards to 20 th century patterns of development, as dictated by previous plans for the district.	<p>No amendment to Plan in response to this issue</p> <p>Self-containment could be achieved through a new settlement, which would be a departure from existing patterns. The Supporting Document, which is available to view on the Councils website, did assess a number of potential locations for a new settlement in East Herts. However, these options were ruled out, either due to sustainability issues, or the fact that they would not be deliverable within the plan period.</p>
3.49	Principle 5 requires much more detail and an imperative for the release of further sites to meet the chronic land supply position within East Herts.	<p>No amendment to Plan in response to this issue</p> <p>This principle has guided the approach to the three sites that were identified as Broad Locations within the Preferred Options version of the District Plan. Given the evidence that is now in place, it is the view of Officers that all three sites should be identified as allocations within the forthcoming Pre-Submission version. This approach provides greater certainty to all parties regarding the delivery of development in these locations.</p> <p>In addition, the development strategy includes sufficient sites in order to allow the Council to demonstrate a five year supply of land from the date of adoption.</p>
3.50	There is no evidence to suggest that Principle 6 has been achieved.	<p>No amendment to Plan in response to this issue</p> <p>East Herts Council is part of the Co-operation for Sustainable Development Group which was set up in order to address cross boundary issues within the housing market area (comprising East Herts, Epping Forest, Harlow and Uttlesford Councils). Three separate Memoranda of Understanding are currently being prepared which will demonstrate that all relevant authorities are in agreement on</p>

		<p>strategic issues including the distribution of housing need across the housing market area, the provision of strategic transport infrastructure, and the protection of Epping Forest Special Area of Conservation.</p> <p>East Herts has also pro-actively engaged with other neighbouring authorities on strategic issues. The Council will also seek to agree Memoranda of Understanding with these authorities before submitting the District Plan to the Planning Inspectorate in March 2017.</p>
3.51	HCC Ecology suggests that the word ‘preserve’ (principle 9) should be changed to ‘maintain’, acknowledging that the countryside is not preserved in aspic. Links between development and the countryside should be supported.	<p>Proposed amendment to Plan in response to this issue</p> <p>Agreed.</p>
3.52	The Bishop’s Stortford Civic Federation suggests that development in villages should be of a sufficient scale to meet the needs of present and future generations in those settlements. The expression of this principle is too restrictive as drafted. Decisions should not be left to local initiatives from Parish Councils as these will ensure development does not happen.	<p>The District Plan does seek to provide a minimum of 500 new dwellings within the most sustainable (Group 1) villages. Primarily, village development will be delivered through Neighbourhood Plans. A number of parishes have already started preparing plans for their areas. The development strategy also allows limited infilling within Group 2 villages.</p> <p>The number of homes being built in village locations will be monitored, and if the minimum target of 500 dwellings is unlikely to be met then this can be addressed through a review of the District Plan.</p>
3.53	Thorley Parish Council believes 3.3.4 should be altered to say that “every effort should be made within the guidelines of government policy”.	<p>No amendment to Plan in response to this issue</p> <p>It is considered that the existing wording accurately reflects national policy.</p>

3.54	A number of landowners, developers and planning agents state that it seems as if EHC accepts that there will be a shortfall in provision of homes in the first five years of the plan period. This is in addition to the shortfall already present in 2011. It is unsound to spread this shortfall across the plan period. Many site promoters argue that NPPG and Planning Inspectorates suggest that the proposed 'Liverpool' method of spreading the shortfall over 15 years is incorrect. Some site promoters advocate the 'Sedgefield' method to making up any shortfall in the first five years. This will mean that either a) delivery of the larger sites and broad locations should be accelerated and/or b) release of additional sites (potentially from the green belt). Housing requirement in the first five years should be considerably higher.	<p>No amendment to Plan in response to this issue</p> <p>A Strategic Housing Market Assessment (SHMA) has been prepared by independent consultants on behalf of the four local authorities that comprise the housing market area. The SHMA indicates that the objectively assessed housing need in East Herts is for 16,390 new homes up to 2033. Based on this level of need, it is likely that the shortfall from 2011 could be addressed in full within the first 5 years of the plan period.</p> <p>The 2014 based household projections were published by the Government on 12th July 2016. The Council is currently working with its housing market area partners in order to understand how this data impacts on the assessment of objectively assessed housing need. If this work results in an increase to the level of need, then it might be necessary to spread the shortfall over the plan period in order to ensure that the Council can demonstrate a five year supply of deliverable sites from the date of adoption.</p>
3.55	Question regarding the definition of larger and smaller sites used in paragraph 3.3.6, there is no justification for why smaller sites are not deliverable within the first five years.	<p>Proposed amendment to Plan in response to this issue</p> <p>The paragraph does not state that smaller sites cannot be delivered in the first five years, but that on their own, they cannot meet the level of identified need in the first five years of the plan period. In any case, this paragraph needs to be updated to reflect the revised development strategy and phasing.</p>
3.56	A number of landowners, developers and planning agents believe that the buffer stated in 3.3.7 should be 20% rather than 5%. This is because there has been a persistent under delivery of houses in East Herts. Additional deliverable sites will be required.	<p>Proposed amendment to Plan in response to this issue</p> <p>Noted. The Council accepts that a 20% buffer is necessary due to persistent under delivery. This paragraph therefore needs to be updated to reflect this position.</p>
3.57	Further growth should be considered in Buntingford to address the shortfall in housing. The land North of Hare Street Road is land that can come forward.	<p>No amendment to Plan in response to this issue</p> <p>Planning permission for land north of Hare Street Road has been granted on appeal, along with other sites on the edge of Buntingford.</p>
3.58	The following should be added to Policy DPS2, "In addition to the allocations identified, additional permissions for new housing may be granted where it is demonstrated to the	<p>No amendment to Plan in response to this issue</p> <p>The development strategy will be kept under review in order to monitor the delivery</p>

	Council’s satisfaction that a development proposal will be of benefit in addressing a shortfall in the District’s five year housing supply or delivering the Council’s strategy for a specific settlement (particularly where allocated or permitted sites are failing to come forward as anticipated).”	of allocated sites. However, it is inevitable that planning applications will be received for land that is not identified within the Plan. These will be assessed against the policies in the Plan through the normal development management process.
3.59	Strategy should provide comprehensively planned new settlements rather than piecemeal additions to towns. No justification for why a Garden City/Town/Village has not been considered, rather than risking the disruption to existing residents from site allocations. Widbury Residents Association suggests a new settlement could be created encircling Watton-at-Stone and Stapleford. Whilst, others suggest that Gilston could be developed into a new garden town/city and 10,000 houses could be built in the plan period. This would reduce the pressure on green belt areas.	<p>No amendment to Plan in response to this issue</p> <p>The Supporting Document, which is available to view on the Councils website, did assess a number of potential locations for a new settlement in East Herts. However, these options were ruled out, either due to sustainability issues, or the fact that they would not be deliverable within the plan period.</p> <p>East Herts, Epping Forest and Harlow Councils will be submitting a joint bid to Government for financial and technical assistance in support of a Garden Town covering the wider Harlow area. However, in terms of the Gilston Area, it is unlikely that more than 3,000 homes could be provided in the plan period. This is reflective of build out rates on similar sites elsewhere in the country.</p>
3.60	Hertford Civic Society suggested that instead of Green Belt releases, land beyond the Green Belt should be identified for development, for example Ashwell and Morden Station in North Hertfordshire could be agreed for development using the Duty to Co-Operate. There is also no reason given why development cannot be accommodated at Watton-at-Stone.	<p>No amendment to Plan in response to this issue</p> <p>Before approaching another authority to take its unmet housing need, all local planning authorities must ensure that they have assessed all the reasonable options, including options which lie within the Green Belt.</p> <p>The Council could adopt a strategy whereby no Green Belt land is released, however this would result in having to provide significantly more development within the more rural area to the north of the District which is not considered to be a sustainable approach.</p> <p>Housing need does represent the exceptional circumstances required to review the Green Belt. This was confirmed by a Planning Inspector during an advisory visit to the Council in early 2016.</p> <p>Watton-at-Stone, which lies within the Green Belt, has been identified for a minimum 10% growth in housing stock, amounting to at least 92 dwellings.</p>
3.61	Object the policy as the strategy is reliant on strategic	No amendment to Plan in response to this issue

	allocations (e.g. north and south of Bishop's Stortford, west of Hertford) coming forward within the early part of the plan period, but there is no certainty or guarantee over their deliverability.	Land to the north of Bishops Stortford now has permission for 2,529 homes, part of which is expected to come forward in the first five years of the plan period. Other sites, including the two west of Hertford, are also expected to deliver housing in the first five years. Prior to submission of the District Plan to the Planning Inspectorate, Statements of Common Ground will be agreed with all site promoters which will, in part, identify when each site should be built out.
3.62	Part IV of Policy DPS2 seeks to phase housing development in the first five years permitting only greenfield/brownfield development on the edges of towns. This restriction of development in villages will result in pent up demand.	No amendment to Plan in response to this issue Part IV covers development in and around the towns. Part VII identifies that development in the villages will also come forward in accordance with Policy VILL1.
3.63	Policy should be extended to commitment to brownfield sites in the villages, not just the towns.	No amendment to Plan in response to this issue The District Plan proposes a strategy whereby development in villages will be addressed by Neighbourhood Plans in accordance with Policy VILL1. It is therefore the role of Parish Councils to decide which sites are allocated for development.
3.64	HCC and others are concerned with the strategy for the broad locations. The precise location and the details of development are left until later in the plan period. This means there is uncertainty with regards to dwelling numbers across the district. The planning for infrastructure will have to be dealt with early.	Proposed amendment to Plan in response to this issue Given the evidence that is now in place, it is the view of Officers that the three areas identified as Broad Locations within the Preferred Options Plan should now be proposed as allocations within the Pre-Submission stage document. Future DPDs will therefore not be required. It is recognised that allocating these sites through the District Plan provides greater certainty to service providers. Policy DPS2 needs to be updated to reflect this change.
3.65	Landowners, developers and planning agents object to Policy DPS2 Part VII as it is reliant on Parish Councils producing Neighbourhood Plans which is an optional tier of planning. It is stated that proposals to bring forward development through localism may threaten delivery in the villages because there are currently no proposals from the Parish Councils for Neighbourhood Plans to bring forward development in their areas. In addition, neighbourhood plans are often tools used by Parish Councils to restrict development, this will go against the aim of the plan. Allocation of sites in the villages through the District Plan is the only way to expedite delivery.	No amendment to Plan in response to this issue A significant number of Parish Councils have started to progress Neighbourhood Plans and therefore the proposed approach is considered to be deliverable. Development in villages will be monitored throughout the plan period in order to ensure that a sufficient amount of new homes are being delivered in rural locations.

Policy DPS3: Housing Supply 2011-2031		
3.66	Policy DPS3 shows a contingency of 6%- in the event of delivery running behind schedule. The table clearly illustrates that this will not be a sufficient buffer to allow for potential slippage.	<p>Proposed amendment to Plan in response to this issue</p> <p>The table needs to be updated to reflect the revised strategy. A 20% buffer has now been included in the first 5 years of the plan period in order to recognise persistent under delivery of housing in recent years.</p>
3.67	Around 20% of the total alleged supply in the first five years is on unidentified sites, this is unsound.	<p>Proposed amendment to Plan in response to this issue</p> <p>It is reasonable to include a small element of windfall development within the trajectory which has been based on past trends. This approach has been accepted by Inspectors at Local Plan Examinations elsewhere in the country. However, following an analysis of past trends, the amount of windfall identified has been reduced. This change should be reflected within Policy DPS3.</p>
3.68	The contribution of Hertford to the housing target is minimal, Hertford is allocated only 7.5% of the housing supply over the plan period. There is clearly scope for more development in Hertford.	<p>No amendment to Plan in response to this issue</p> <p>The potential for further development in the Hertford area is limited by a number of issues. Most notably, the County Council has advised that the capacity of the A414 in Hertford is a considerable constraint which is unlikely to be overcome without a strategic intervention. Further planned development in the Hertford area is therefore not deliverable at this stage.</p> <p>Investigations have been undertaken by HCC to seek to identify measures that would mitigate congestion as part of ensuring that the highway network can operate with the additional development proposed in the Plan. HCC is currently preparing its 'Hertfordshire 2050 Transport Vision' which is considering strategic mitigation schemes as part of its remit and the A414 through Hertford is a key issue for consideration through this process. East Herts Council is fully engaged with, and contributing to, this process, as appropriate.</p>
3.69	It will be extremely difficult to bring forward all the sites noted for early delivery due to planning permission, site preparation and infrastructure delivery issues. Therefore, strategic sites should be brought forward in line with the District Plan. Land at Thieves Lane, Hertford is ideally placed to be brought forward in the first five years of the plan.	<p>No amendment to Plan in response to this issue</p> <p>Land at Thieves Lane, Hertford has been identified for delivery in the first five years of the plan period.</p>

3.70	St John's College Cambridge owns land west of the proposed allocations at Sawbridgeworth and states that it is imperative that the bypass remains an option for the District Council (and the County Council) to pursue and importantly development that does occur within the plan period does nothing to jeopardise or thwart any future plans for the bypass on the west side of the town.	<p>No amendment to Plan in response to this issue</p> <p>The option for a large-scale extension west of Sawbridgeworth, involving up to 3,000 homes and a western bypass, was assessed in the Supporting Document to the District Plan. This concluded that the option was not suitable, given potential harm to the character of the town and also, when considered in conjunction with the Gilston Area, concern with regard to coalescence.</p>
3.71	The table utilised in DPS3 should be replaced with table shown in Appendix B.	<p>No amendment to Plan in response to this issue</p> <p>The table in Policy DPS3 is a simplified version of the overall trajectory. It is considered appropriate to include the full version as an Appendix rather than the main body of the document.</p>
3.72	The word “minimum” should be added to the windfall allowance column in Policy DPS3 as smaller sites can help with the undersupply of housing.	<p>No amendment to Plan in response to this issue</p> <p>It is not considered necessary to identify the windfall figure as a minimum. It is inevitable that planning applications will be received for land that is not identified within the Plan. These will be assessed against the policies in the Plan through the normal development management process.</p>
3.73	The Stevenage west site needs to be re-considered, in order to take pressure off the villages.	<p>No amendment to Plan in response to this issue</p> <p>The area to the west of Stevenage is not located within the administrative boundary of East Herts. It is therefore not for this Council to consider the merits of development in this location.</p>
3.74	It is assumed a key component contributing to the village allocations is the SLAA. Based on the information available 220 dwellings have been identified as suitable through the SLAA.	<p>No amendment to Plan in response to this issue</p> <p>An updated SLAA document which assesses sites on the edge of villages, as well as those within existing village boundaries, has now been published. This identifies that there are sufficient sites to meet the proposed level of growth in rural locations. In addition, it is highly likely that there are further sites that maybe considered suitable for development that have not been assessed through the SLAA process.</p>
3.75	The Bishop's Stortford Civic Federation is concerned that taken together with proposals in Uttlesford, the District Plan would lead to ribbon development from Harlow to Elsenham.	<p>No amendment to Plan in response to this issue</p> <p>While the District Plan includes proposals for new housing on the edge of both Bishop's Stortford and Sawbridgeworth, the strategic Green Belt gaps between</p>

		settlements will be maintained.
3.76	There needs to be formal assessments of the sites identified in the call for sites 2009 and the District Plan sites.	<p>No amendment to Plan in response to this issue</p> <p>This process has taken place through the SLAA with further consideration given to sites as part of the Sustainability Appraisal process.</p>
3.77	No need to plan beyond 2031 (footnote 2 of Policy DPS3). The uncertainty raised in 3.3.10 around the broad locations make this statement very strange.	<p>Proposed amendment to Plan in response to this issue</p> <p>Footnote 2 needs to be updated to reflect the change in approach to sites previously identified as Broad Locations. The Gilston Area will deliver 10,000 homes, both within this plan period and beyond. The NPPF is clear that local authorities should be satisfied that Green Belt boundaries will not need to be reviewed again at the end of the plan period. While it is not possible to know what the level of housing need will be beyond 2033, it is clear that the Gilston Area will be able to meet a significant proportion of this future need thereby reducing the need to further review Green Belt boundaries.</p>
3.78	<p>It is not clear from the evidence provided whether:</p> <ul style="list-style-type: none"> • Sites have been assessed for site specific constraints e.g. protected trees/hedgerows, protected species, risk of flooding, heritage assets, contamination or air/noise quality. • Landowners are willing to sell/promote land for development. • There is a willing developer or house builder for each site. <p>This information would normally be available via a SHLAA. However EHC do not have an up to date SHLAA. Therefore, it is questioned how housing numbers and delivery timing can be given.</p>	<p>No amendment to Plan in response to this issue</p> <p>Sites have been assessed both through the Sustainability Appraisal/Supporting Document process and also the SLAA. Constraints such as those listed in the representation have been considered as part of this work.</p> <p>Ahead of the Examination, the Council will be seeking to agree Statements of Common Ground with the site promoters of each of the sites identified within the District Plan. This will help demonstrate certainty of delivery to the Inspector.</p>
3.79	Given that the Broad Locations for Welwyn and Harlow adjoin those authorities, it could reasonably be argued that all housing completions in those adjacent areas within East Herts should be assigned to those authority areas as the likely service providers.	<p>No amendment to Plan in response to this issue</p> <p>All sites identified within the District Plan are required to meet East Herts housing needs.</p>

Policy DPS4: Broad Locations for Development		
3.80	A number of respondents made representations on Policy DPS4 in order to object to the identification of sites as Broad Locations due to uncertainty of delivery, and as a result, other sites should be allocated within the plan. Service providers also raised concerns regarding uncertainty over the quantum of development in these locations.	<p>Proposed amendment to Plan in response to this issue</p> <p>Given the evidence that is now in place, it is the view of Officers that all three sites should be identified as allocations within the forthcoming Pre-Submission version. This approach provides greater certainty to all parties regarding the delivery of development in these locations.</p> <p>As a result, this section should be removed from the chapter. Information about the delivery of the three sites previously identified as Broad Locations can be found in the relevant settlement chapters.</p>
3.81	Harlow Council considers that LPA's should identify areas of "safeguarded land" in order to meet longer term development needs beyond the plan period. This approach may be relevant to Gilston.	<p>No amendment to Plan in response to this issue</p> <p>The Gilston Area will deliver 10,000 homes, both within this plan period and beyond. Given likely build out rates, a large part of the site would be delivered post 2033 – it is not considered necessary to reserve land to achieve this.</p>
3.82	Landowners, developers and planning agents state that the policy base for the broad locations is entirely unsound. These sites have not been considered properly in terms of financial viability, infrastructure or land assembly.	<p>No amendment to Plan in response to this issue</p> <p>Issues regarding viability and infrastructure provision have been considered as part of the Delivery Study. Due to the level of evidence that is now in place, it is the view of Officers that the three sites previously identified as Broad Locations should now be allocated within the District Plan.</p>
Policy DPS5: Infrastructure Requirements		
3.83	HCC state that 3.3.17 should refer to other services which HCC is responsible e.g. Community protection, adult care and youth facilities (not just education and transport).	<p>Proposed amendment to Plan in response to this issue</p> <p>Noted. It would make the sentence fairly wordy to include all services that HCC provide. However the wording could be amended to indicate that other services are provided as well as education and transport.</p>
3.84	Natural England suggests that it would be logical to include green infrastructure under the list of items in Policy DPS5 that may require financial contributions from developers.	<p>No amendment to Plan in response to this issue</p> <p>The list of items in DPS5 includes critical infrastructure schemes that are essential to the delivery of the development strategy over the plan period. It is recognised</p>

		that many more schemes should also be delivered to support growth and these will be identified within the Infrastructure Delivery Plan. Nevertheless, the list in Policy DPS5 will need to be updated to reflect schemes which have become critical such as provision of a new Junction 7a on the M11.
3.85	DPS5 Criterion III, Part c), should be amended to read “New schools and the expansion of existing schools.”	Proposed amendment to Plan in response to this issue Noted and agreed.
3.86	HCC state that they should be involved in the early stages of the IDP. It is important that the ability to mitigate new development is not limited just to planning obligations (DPS5 Part IV).	No amendment to Plan in response to this issue Noted. HCC are being consulted with regards to the content of the IDP.
3.87	There needs to be greater clarity and detail with regards to infrastructure. The infrastructure delivery plan should be prioritised, in particular the levels of planning obligations as in DPS5 IV.	No amendment to Plan in response to this issue Agreed. This is addressed through the Delivery Study and the Infrastructure Delivery Plan (IDP).
3.88	There will be insufficient public funding to produce the infrastructure required to meet the level of development. Who will be funding the infrastructure?	No amendment to Plan in response to this issue Many infrastructure schemes will be provided on site by developers. For other schemes, such as school expansions, developers will contribute towards the cost through the use planning obligations. However, in order to deliver strategic schemes such as improvements to M11 junctions, significant funding from central government will be required.
3.89	NHS England raise concerns over the capacity of local practises to deal with the additional patients created from proposals. Significant contribution from CIL or Section 106 would be required. The addition of 15,000 houses (36,000 population) will require an additional 18 GPs and 3,582m ² of surgery premises.	No amendment to Plan in response to this issue Noted. NHS England will be consulted when the Council review the Planning Obligations SPD in order to ensure that the level of financial contributions sought is sufficient to allow the expansion of health facilities where required.
3.90	Concerns about school places, schools within East Herts are at capacity. It is questioned why more new schools are proposed in Bishop’s Stortford than in Ware/Hertford when there is larger scale development proposed for Ware/Hertford.	No amendment to Plan in response to this issue The Council has worked closely with Hertfordshire County Council, as education authority, throughout the plan making process. In order to support the planned level of growth, new schools will be required alongside expansion of some existing schools. These schemes will all be identified within the Infrastructure Delivery Plan.

		The level of development proposed for Bishop’s Stortford is greater than that proposed for Hertford and Ware combined. While primary education provision in Hertford was an issue at the time of consultation in 2014, especially at the primary level, the situation has been significantly improved by Simon Balle School becoming an ‘all through’ facility from September 2015. This has relieved pressure on other primary education facilities in the town. In addition, development to the North and East of Ware will include provision for a new secondary school. The Council will continue to work closely with HCC in order to ensure that the educational needs arising from the proposed level of development in Hertford can be met throughout the plan period.
3.91	Concerns about traffic congestion on many routes including: A120, A602, A414, A10, roads in and around Hertford and Bishop’s Stortford.	No amendment to Plan in response to this issue 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.
3.92	Concerns about rail capacity. Why can’t rail links be extended? This will solve issues connected to air quality, transport and sustainability.	No amendment to Plan in response to this issue 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 need for additional capacity on the Liverpool Street line has been highlighted through several mechanisms and the four-tracking of the line between the Tottenham Hale and Broxbourne areas has been included in Network Rail’s recently published Anglia Route Study, March 2016: http://www.networkrail.co.uk/Anglia-Route-Study.pdf This currently anticipates potential commencement within Control Period 6 (i.e. between 2019-2024).
3.93	Stevenage Borough Council suggests that the capacity of Rye Meads Sewage Treatment Works will need to be reviewed.	No amendment to Plan in response to this issue

		The Council has engaged with Thames Water throughout the plan making process. Their latest advice indicates that Rye Meads STW has sufficient capacity to cater for all growth in the wider sub-region up to 2033 and beyond.
3.94	Great Munden Parish Council and others are concerned that the Little Hadham Bypass could increase traffic speed and volume through Standon and increase the possibility of east/west traffic problems.	No amendment to Plan in response to this issue 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 and local initial consultation was undertaken by HCC between February and March 2016. Therefore, as HCC would be the responsible authority for delivering such a bypass, this issue falls outside the remit of the District Plan.
3.95	Thorley Parish Council is concerned that the Local Planning Authority does not have the ability to enforce S106 agreements. An example of this is the developer agreements to provide shops at St. Michael’s Mead, which was not forthcoming. The Member of Parliament and the District Council should work together to ensure that the necessary legislation is enacted to prevent this happening again.	No amendment to Plan in response to this issue Noted. While the spending of S106 contributions falls outside the plan making process, the Council is working with HCC in order to ensure that S106 payments and expenditure are monitored closely and contributions are spent before the end of the statutory timescales.
3.96	The Environment Agency supports Policy DPS5, particularly in regards to sewage infrastructure.	No amendment to Plan in response to this issue Support noted and welcomed.
3.97	Question whether Affinity Water and Thames Water are able to meet the demand for water supply/sewage from the proposed development.	No amendment to Plan in response to this issue Throughout the Plan making process, the Council has engaged with the relevant water providers in order to ensure that the proposed level and location of growth can be provided for. The water companies have not objected to the proposed scale or location of development in East Herts.
3.98	Stansted Airport Ltd is concerned that there needs to be specific evidence, and a mechanism to ensure that fair and proportionate contributions towards the upgrades to Junction 8 of the M11 will be secured. The IDP document should be consulted on before the District Plan so to avoid unnecessary	No amendment to Plan in response to this issue It is recognised that upgrades to Junction 8 will be required in order to facilitate the level of growth envisaged in conjunction with increased patronage at Stansted Airport and this is recognised by the Infrastructure Delivery Plan.

Chapter 3 – Development Strategy

	debate and objection.	A Memorandum of Understanding (MoU) is being prepared, which will be signed by Highways England, Essex and Hertfordshire County Councils and the four local authorities that comprise the housing market area (including East Herts). The MoU will confirm that the respective authorities will work collaboratively to identify, develop and deliver highway infrastructure schemes in order to support housing growth.
3.99	Thames Water supports Policy DPS5 and the accompanying text in section 3.3.16-20.	No amendment to Plan in response to this issue Support noted and welcomed.
Policy DPS6: Long-Term Planning		
3.100	A number of respondents have questioned the merits of including this section within the chapter, mostly because it does not engender confidence that the identified strategy will be delivered.	Proposed amendment to Plan in response to this issue It is considered that this section should be removed as there is now more evidence and more certainty that large scale strategic sites will be delivered. The strategy also now includes a 20% buffer in the first 5 years of the plan period in order to provide greater certainty of delivery. Following adoption, the implementation of the plan will be monitored. If targets are not being met then it is likely that a review of the Plan would be triggered.
Policy DPS7: Presumption in Favour of Sustainable Development		
3.101	The Labour Party welcome the significant growth in housing noted in the plan. A future must not be created where the extreme cost of housing in East Hertfordshire forces the next generation to live miles away. Housing is also important in accommodating our changing society where people live longer and marry later. Housing growth is a good thing if planned properly with supporting infrastructure (including social infrastructure). Lastly, houses need to be viewed as homes and not investment vehicles.	No amendment to Plan in response to this issue Noted.

EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 25 AUGUST 2016

REPORT BY LEADER OF THE COUNCIL

EAST HERTS DRAFT DISTRICT PLAN – CHAPTER 4 – GREEN BELT AND RURAL AREA BEYOND THE GREEN BELT: RESPONSE TO ISSUES RAISED DURING PREFERRED OPTIONS CONSULTATION

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

The purpose of this report is:

- To bring to Members attention the issues raised through the Preferred Options consultation in connection with Chapter 4 (Green Belt and Rural Area Beyond the Green Belt) of the Draft District Plan Preferred Options version, together with Officer responses to those issues.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:	
(A)	the issues raised in respect of Chapter 4 (Green Belt and Rural Area Beyond the Green Belt) of the Draft District Plan Preferred Options, as detailed at Essential Reference Paper 'B' to this report, be received and considered; and
(B)	the Officer response to the issues referred to in (A) above, as detailed in Essential Reference Paper 'B' to this report, be agreed.

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.

1.2 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.

1.3 This report presents the Issue Report for the Green Belt and Rural Area Beyond the Green Belt chapter at **Essential Reference Paper 'B'**.

2.0 Report

2.1 The Issue Report summarises the issues raised through the Preferred Options Consultation relating to the Green Belt and Rural Area Beyond the Green Belt chapter. The table presents an officer response to each issue and then sets out whether or not it is proposed that any subsequent proposed amendments to the text or policies of the draft Plan be made as a result. Where issues are site specific or settlement specific, more detail is provided within the respective settlement chapter.

2.2 Given that there are considerable changes required to the Green Belt and Rural Area Beyond the Green Belt chapter, it is considered appropriate that the Green Belt and Rural Area Beyond the Green Belt chapter be rewritten to take these factors into account rather than presenting a 'track change' iteration of the previous version. Therefore, unlike the approach taken for the Development Management Chapters, the Issue Report for this chapter does not specify a form of wording that any proposed amendment should take.

2.3 In consequence, it is likewise not proposed that amendments are shown in the form of 'track changes'. Instead, a revised chapter, which incorporates any proposed necessary amendments to the Plan identified in the Issue Report, will be brought before Members for consideration at the District Planning Executive Panel meeting on 8th September.

2.4 Members are therefore invited to agree the Issue Report, as detailed in Essential Reference Paper 'B' to this report, as a basis for informing a redrafted chapter on the Green Belt and Rural Area Beyond the Green Belt in the final 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:	Priority 1 – Improve the health and wellbeing of our communities Priority 2 – Enhance the quality of people's lives Priority 3 – Enable a flourishing local economy
Consultation:	The Report refers to the Draft District Plan consultation carried out between 27 th February and 22 nd May 2014.
Legal:	None
Financial:	None
Human Resource:	None
Risk Management:	None
Health and wellbeing – issues and impacts:	The 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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Number	Paragraph /Policy	Issue raised through consultation	Officer Response
General issues			
4.01		Opposition to development on Green Belt land. With respondents citing the purposes of the Green Belt as reasons to prevent development.	<p>No amendment in response to this issue</p> <p>The Council has tried to utilise brownfield land as far as possible but only a small proportion of the housing need can be met in this way. Greenfield development is therefore necessary in order to meet identified housing needs. The Council could adopt a strategy whereby no Green Belt land is released, however this would result in having to provide significantly more development within the more rural area to the north of the District which is not considered to be a sustainable or deliverable approach.</p> <p>Housing need does represent the exceptional circumstances required to review the Green Belt. This was confirmed by a Planning Inspector during an advisory visit to the Council in early 2016.</p>
4.02		Opposition to development on Green Belt land as it would create urban sprawl.	<p>No amendment in response to this issue</p> <p>Planned development would not constitute sprawl, which is by definition uncontrolled.</p>
4.03		Most of this chapter replicates NPPF and is therefore not necessary.	<p>Proposed amendment to Plan in response to this issue</p> <p>Agreed, there is a case for the rationalisation of the chapter to avoid replicating the NPPF. However, there is an expectation that the District Plan contains reference to Green Belt policy.</p>
4.04		Thorley Parish Council and others comment that when loss of Green Belt is unavoidable it must be policy that additional land receives Green Belt designation (within the District), to compensate the loss.	<p>No amendment in response to this issue</p> <p>It is acknowledged that the NPPF makes provision for the creation of compensatory Green Belt and contains a set of criteria against which new Green Belt should be considered (para. 82). It is not considered that any exceptional circumstances arise in the proposed Plan that justify the creation of new Green Belt. It is considered that normal planning and development management policies would be adequate for the Council to successfully defend its position.</p>
4.05		Consideration must be given to providing natural green spaces and public leisure facilities beyond the Green Belt (in the countryside) to compensate for intensification of areas with little open space.	<p>No amendment in response to this issue</p> <p>The Plan requires developments to provide sufficient open spaces for sport and recreation on site, or make a contribution to enhancements of existing open spaces. Where a site is on the edge of an existing settlement, the Plan requires developments to ensure connectivity between the site and the existing community and to the wider countryside beyond the site through the retention and or creation of new Public Rights of Way.</p> <p>The NPPF contains guidance as to what can be constructed in and beyond the Green Belt. The</p>

Number	Paragraph /Policy	Issue raised through consultation	Officer Response
			construction of leisure facilities beyond the Green Belt (i.e. in the Rural Area Beyond the Green Belt) is unlikely to represent sustainable patterns of development. If such facilities are proposed, there would be a judgement made as to their suitability in terms of sustainability which would include their accessibility and their impact on the countryside.
4.06		Great Amwell Parish Council supports no amendments to Green Belt boundaries in its locality.	No amendment in response to this issue Acknowledged.
4.07		The Green Belt must be protected from development- a new town or garden city should be built perhaps to the north of the district.	No amendment in response to this issue Only the lower third of the District is within the Green Belt. The Council could adopt a strategy whereby no Green Belt land is released, however this would result in having to provide significantly more development within the more rural area to the north of the District which is not considered to be a sustainable approach as it cannot be proven to be deliverable with supporting infrastructure within the Plan-period.
4.08		Local people hold Green Belt land dear. It is important that the principles of sustainability clearly apply and that development occurs on Green Belt land only in exceptional circumstances.	No amendment in response to this issue This approach is acknowledged in the strategy. Housing need represents the exceptional circumstances required to review the Green Belt. This was confirmed by a Planning Inspector during an advisory visit to the Council in early 2016.
4.09		Thorley Parish Council, Hertingfordbury Parish Council and others comment that unmet housing needs do not constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.	No amendment in response to this issue Housing need does represent the exceptional circumstances required to review the Green Belt. This was confirmed by a Planning Inspector during an advisory visit to the Council in early 2016.
4.10		Opposition to “carefully selected Green Belt releases in locations adjacent to towns”. This is against the whole ethos of Green Belt which looks to separate settlements and prevent coalescence of urban areas.	No amendment in response to this issue Officers consider that there are no circumstances where the planned release of Green Belt will cause coalescence of settlements.
4.11		Who decides which parts of the Green Belt are to be “carefully selected for release”?	No amendment in response to this issue An independent review of the Green Belt has been undertaken and Officers consider the recommendations of this in the light of all evidence and other planning considerations. It is for the full Council to endorse the proposed Plan which will then be subject to an examination in public held by the Planning Inspectorate.

Number	Paragraph /Policy	Issue raised through consultation	Officer Response
4.12		Particular effort must be made to ensure that buffer zones around villages are preserved e.g. Great Amwell.	<p>No amendment in response to this issue</p> <p>There is no 'buffer zone' approach to development. Green Belt policy in itself is a barrier to development around Green Belt villages.</p>
4.13		This plan applies Green Belt policy to the majority of the district, which is not so designated.	<p>No amendment in response to this issue</p> <p>East Herts has a long established tradition of restraint on inappropriate development within the Rural Area Beyond the Green Belt. This is a recognition that the environmental assets of the district require an equally protective policy framework and has ensured the protection of the smaller rural settlements, as well as the wider area of countryside.</p>
4.14		There are deliverable sites within the settlements which have not been fully explored which could have an impact on the required level of Green Belt release.	<p>No amendment in response to this issue</p> <p>The Council has always sought to bring forward brownfield sites wherever possible. This includes the Goods Yard in Bishop's Stortford and the Mead Lane area in Hertford which are proposed for allocation within the District Plan. However, being a predominantly rural district, there are very few brownfield sites available. Therefore development on greenfield sites is required.</p>
4.15		Hertford Civic Society and others consider that the District Plan does not set out exceptional circumstances required to justify alteration to Green Belt boundaries. The resulting Green Belt boundaries would not have the permanence required by NPPF.	<p>No amendment in response to this issue</p> <p>Housing need does represent the exceptional circumstances required to review the Green Belt. This was confirmed by a Planning Inspector during an advisory visit to the Council in early 2016. Proposed outer boundaries of allocated sites are defined along identifiable features. It is also possible to ensure existing boundary features are more robust through development.</p>
4.16		Removing areas of Green Belt can only be negative especially since it will be almost impossible to designate new Green Belt areas according to PPG.	<p>No amendment in response to this issue</p> <p>The Council has tried to utilise brownfield land as far as possible but only a small proportion of the housing need can be met in this way. Greenfield development is therefore necessary in order to meet identified housing needs. The Council could adopt a strategy whereby no Green Belt land is released, however this would result in having to provide significantly more development within the more rural area to the north of the District which is not considered to be a sustainable or deliverable approach. As such, if the Council is to meet its objectively assessed housing needs in full as also required by the NPPF and PPG, it is necessary to allocate land for development that will result in the loss of Green Belt land.</p>
4.17		It should be made clear that the objective remains that Green Belt land should retain clearly defined	<p>No amendment in response to this issue</p>

Number	Paragraph /Policy	Issue raised through consultation	Officer Response
		man-made or natural boundaries.	Proposed outer boundaries of allocated sites are defined along identifiable features. It is also possible to ensure existing boundary features are more robust through development, such as via planting and layout considerations.
4.18		The broad locations need to be decided as part of this plan. Currently the plan comments that very little land is being taken from the Green Belt, however at the same time it shows the majority of future housing to be on present Green Belt land (broad locations).	No amendment in response to this issue Since the Preferred Option Consultation, a considerable amount of work has been undertaken to progress the Broad Location options and it is now the view of Officers that these should become allocated sites in the District Plan.
4.19		NPPF makes it clear that if the open character of a village makes an important contribution to the openness of the Green Belt it should be included in or washed over by the Green Belt, but where not, it should be excluded. There is no evidence of the council applying this national policy.	No amendment in response to this issue The Council is not proposing to remove villages from the Green Belt where they are currently washed over. Paragraph 89 permits limited infilling within Green Belt villages and an assessment of the impact of an infilling proposal on the openness of the village would be considered as part of the planning application process.
4.20		The Council has failed to consider small sites that "round off" Green Belt boundaries.	No amendment in response to this issue In many circumstances, smaller sites may still make a contribution to Green Belt purposes. The process of reviewing Green Belt boundaries is set out in the NPPF, which does not include 'rounding-off' boundaries. In some locations, it is appropriate to amend the Green Belt boundary in order to ensure the robustness of the boundary having regard to their permanence in the long term. These sorts of locations have been considered through the Settlement Appraisal process.
4.21		The Labour Party comments that the District Plan allows the examination of Green Belt boundaries to consider if all the land meets the criteria for Green Belt. It also needs to be re-appraised to check that it is not inhibiting sustainable development which could enhance the local area.	No amendment in response to this issue Agreed. A Green Belt Review has been undertaken and amendments to the boundary are proposed to secure a sustainable pattern of development across the district.
4.22	4.1.3	Objection to the non-inclusion of the North and East of Ware from the list of sites to be released.	No amendment in response to this issue It is the view of Officers that land to the north of Ware should be allocated for development in the District Plan for 1,000 homes, with land for a further 500 homes safeguarded for development beyond the Plan-period. This issue is considered further through the Ware Settlement Appraisal.

Number	Paragraph /Policy	Issue raised through consultation	Officer Response
4.23	4.1.3	Thorley Parish Council does not agree that development outside the Green Belt would be unsustainable or contrary to NPPF.	No amendment in response to this issue It is correct that some development in settlements beyond the Green Belt may be considered to be sustainable. However, these sites alone would not be capable of accommodating the District's needs.
4.24	4.1.3	The wording of 4.1.3 suggests that there is availability for housing on brownfield sites. These options should be further assessed and not dismissed.	No amendment in response to this issue The Council has always sought to bring forward brownfield sites wherever possible. This includes the Goods Yard in Bishop's Stortford and the Mead Lane area in Hertford which are proposed for allocation within the District Plan. However, being a predominantly rural district, there are very few brownfield sites available. Therefore development on greenfield sites is required.
4.25	4.1.5	Hertford Civic Society objects to the release of land and Hollybush Primary School and Sele School. The Green Belt Review recommendations are not sound.	No amendment in response to this issue As development is planned to the west of Hertford, these school sites would no longer be on the edge of the town and therefore would not contribute to the purposes of the Green Belt as defined by the NPPF. Other policy designations remain that can be used to manage development on these sites.
4.26	4.1.5	HCC welcome the removal of Hollybush Primary School, Sele School, Leventhorpe School and Mandeville Primary School from the Green Belt.	No amendment in response to this issue Support noted and welcomed.
4.27	4.1.5	HCC considers that a number of schools in East Herts are on the edge of settlements where the Green Belt boundary could be amended to include the school site within the built up area. These include: Hillmead Primary School, St Joseph's Catholic Primary School, Morgans Primary School, Simon Balle School, Reedings Junior School, Priors Wood Primary School, Sacred Heart Catholic Primary School and Watton-at-Stone Primary School.	No amendment in response to this issue In general the Council has not sought to remove school sites from the Green Belt. The potential need to expand schools is considered to represent the 'very special circumstances' required to allow development within Green Belt areas. Proposals should therefore be pursued through the planning application process.
4.28	4.1.5	HCC suggests (in order of preference) that consideration is given to: <ul style="list-style-type: none"> The removal of Green Belt designation from school sites. 	No amendment in response to this issue It is the view of Officers that it is unnecessary to remove these schools from the Green Belt (see Issue 4.27).

Number	Paragraph /Policy	Issue raised through consultation	Officer Response
		<ul style="list-style-type: none"> The identification of MDS status for those schools which are currently washed over by the Green Belt. The revision of those school sites with MDS status to review whether the boundaries of the site enable the growth required to meet any increase in needs as a result of further development. 	The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purposes of including land within it than the existing development. Officers propose the removal of the MDS section. Therefore, the impact of proposals will be dealt with on a case by case basis. The potential need to expand schools is considered to represent the 'very special circumstances' required to allow development within Green Belt areas. Proposals should therefore be pursued through the planning application process.
4.29	4.1.6	HCC considers that the primary school and early years centre at Watton-at-Stone are located outside the village boundary. It would be helpful if the Green Belt boundary could be reassessed to at least exclude the built development (if not whole school site), from the Green Belt.	<p>No amendment in response to this issue</p> <p>This issue will be considered through the production of the Watton-at-Stone Neighbourhood Plan (see also Issue 4.27).</p>
4.30	4.1.7	The plan does not define the broad locations precisely; therefore it does not define the boundaries of the Green Belt which is contrary to NPPF.	<p>No amendment in response to this issue</p> <p>Since the Preferred Option Consultation, a considerable amount of work has been undertaken to progress the Broad Location options and it is now the view of Officers that these locations should become allocated sites in the District Plan. Whilst there is no amendment to the Green Belt chapter as a result of this particular issue, these matters are considered in more detail in the relevant settlement chapters and appraisals.</p>
4.31	GBR1	Policy GBR1 is unnecessary as it duplicates NPPF.	<p>Proposed amendment to Plan in response to this issue</p> <p>Agreed, there is a case for the rationalisation of the chapter to avoid replicating the NPPF.</p>
4.32	GBR1	HCC are pleased that mineral extraction is not listed as inappropriate in the Green Belt and the Rural Area Beyond the Green Belt.	<p>No amendment in response to this issue</p> <p>Support noted.</p>
4.33	GBR1	HCC would wish East Herts to consider revising the Green Belt boundary in light of the allocated waste sites at Cole Green and Westmill. This would be in line with the Waste Sites Allocations Plan.	<p>No amendment in response to this issue</p> <p>An isolated removal of these sites from the Green Belt would not be appropriate, resulting in an illogical pattern of Green Belt. If there was a larger change to the Green Belt, for example in tandem with development then this approach would be suitable.</p>
4.34	GBR1	Stevenage Borough Council state that the plan does not make provision to review the Green Belt	<p>No amendment in response to this issue</p>

Number	Paragraph /Policy	Issue raised through consultation	Officer Response
		to the east of Stevenage. A small scale development here has potential to meet development needs.	This issue will be considered through the Stevenage Settlement Appraisal. Since the Preferred Option Consultation, a considerable amount of work has been undertaken to assess land to the east of Stevenage. It is now the view of Officers that a site should be allocated for development in the Pre-Submission Plan. Whilst there is no amendment to the Green Belt chapter a new chapter on land to the East of Stevenage and the supporting Settlement Appraisal considers this issue in more detail.
4.35	GBR1	Stevenage Borough Council considers a safeguarding approach is required at Stevenage in order to ensure long term development requirements are not compromised.	No amendment in response to this issue Since the Preferred Options consultation, Stevenage Borough Council have submitted their Plan to the Planning Inspectorate and have not identified a need within this Plan period to look beyond the Borough boundary. It is impossible at this stage to determine what the longer term requirements will be and how to plan for that at this current stage.
4.36	GBR1	Bishop's Stortford North Consortium comments that the council should be clearer about which uses are not inappropriate development within the Green Belt. Reference to playing fields, recreation and open space should be identified as not being inappropriate.	No amendment in response to this issue Recent cases indicate that such uses can be considered as inappropriate within the Green Belt. Regardless of this, the policy is to be amended to refer to the relevant NPPF paragraphs. See Issue 4.31 above
4.37	GBR1	Datchworth Parish Council request the addition of the following to this policy, "Such redevelopment will not be permitted if it would generate traffic that by its quantity or size will be inappropriate for the existing highways within and serving the nearby area. Highway improvements to serve re-development of brownfield sites will not be permitted other than as a result of and associated with a Neighbourhood Plan process."	No amendment in response to this issue Highway impacts and improvements are not a Green Belt chapter issue. Whilst a Neighbourhood Plan could set out potential mitigation measures in relation to development, such matters would be dealt with through the planning application process.
4.38	GBR1, Part II (c) & (g)	HCC welcomes part II, (c) and (g) if they would allow for the expansion of schools located in the Green Belt to meet the increase demand for places.	No amendment in response to this issue Support noted. However, the policy is to be simplified to avoid repetition of the NPPF. See Issue 4.31 above.
4.39	GBR1, Part II (d)	Policy HOU8 would be more appropriately included in this Green Belt chapter as it relates to replacement buildings in the Green Belt.	No amendment in response to this issue Comment noted. Policy HOU8 will be deleted and matters related to replacement buildings will be considered in accordance with Policies GBR1 and GBR2. A new paragraph (14.12.3) to be added to the Housing Chapter referring the reader to Chapter 4: Green Belt and Rural Area

Number	Paragraph /Policy	Issue raised through consultation	Officer Response
			Beyond the Green Belt.
4.40	GBR1, Part II (e)	Since boundaries are being drawn around group two villages this is effectively removing them from the Green Belt, hence there is no need to include part (e).	No amendment in response to this issue The boundaries are not intended to be a limit to development, but were instead a tool defining the built-up part of the settlement within which limited infilling could be acceptable. The boundary was not a means of removing a village from the Green Belt.
4.41	GBR1, Part III (a)	It appears that mineral extraction in the Green Belt is being used as an excuse to develop sites.	No amendment in response to this issue There is no presumption that mineral extraction is a precursor to built development. If a site is considered suitable for development, but there are mineral reserves beneath, there is an expectation that the mineral reserve is not sterilised – therefore extraction should occur before the planned development.
Rural Area Beyond the Green Belt			
4.42	GBR2	Policy GBR2 uses the same wording as GBR1 and applies it to areas that are not Green Belt. This undermines Green Belt policy and NPPF. If the council wishes to implement countryside policies they should be different from Green Belt policies.	No amendment in response to this issue East Herts has a long established tradition of restraint on inappropriate development within the Rural Area Beyond the Green Belt. This is a recognition that the environmental assets of the district require an equally protective policy framework and has ensured the protection of the smaller rural settlements, as well as the wider area of countryside.
4.43	GBR2	HCC comments that the boundary of the rural area beyond the Green Belt at Buntingford should be revised to exclude sites of Edwinstree Middle School, Freman College and Layston First School. These sites should be included within the town boundary.	No amendment in response to this issue The settlement boundary around Buntingford will be redrawn to reflect the latest position in terms of development. The settlement boundary will therefore include the schools within the town boundary. Whilst there is no amendment to the Green Belt chapter in response to this issue, this issue is considered in more detail in the Buntingford Issues Report.
4.44	GBR2	This policy should be adjusted to exclude the area of west Buntingford.	No amendment in response to this issue It is the view of Officers that this site should not form part of the Development Strategy. This issue is considered in the Buntingford Issues Report and Settlement Appraisal.
4.45	GBR2	The Canal and Rivers Trust comments that it should be recognised that waterways are non-footloose assets and the facilities required to support their function are non-footloose too. Facilities should be located adjacent to the waterspace they serve. The wording of this policy	No amendment in response to this issue Part II. (b) already refers to appropriate facilities for outdoor sports and recreation as being exceptions to this policy, which this sort of use would fall within. It is not considered necessary to add specific reference to waterspace uses in this policy.

Number	Paragraph /Policy	Issue raised through consultation	Officer Response
		may need widening to allow development required to service existing outdoor recreational facilities.	
4.46	GBR2	Bishop's Stortford Civic Federation and others comment that this area should not be subject to policies as restrictive as those applying to Green Belt.	<p>No amendment in response to this issue</p> <p>East Herts has a long established tradition of restraint on inappropriate development within the Rural Area Beyond the Green Belt. This is a recognition that the environmental assets of the district require an equally protective policy framework and has ensured the protection of the smaller rural settlements, as well as the wider area of countryside.</p>
4.47	GBR2, Part II, (c) & (g)	HCC welcomes part II, (c) and (g) if they would allow for the expansion of schools located in the Green Belt to meet the increased demand for places.	<p>No amendment in response to this issue</p> <p>In general the Council has not sought to remove school sites from the Green Belt. The potential need to expand schools is considered to represent the 'very special circumstances' required to allow development within Green Belt areas. Proposals should therefore be pursued through the planning application process.</p>
4.48	GBR2. Part II (e) & (f)	Objection to part (e) and (f) as these are contrary to NPPF, villages in the rural area beyond the Green Belt are not subject to Green Belt policy. The wording of these parts should be amended to permit limited infilling in both Group 2 and 3 Villages.	<p>Proposed amendment to Plan in response to this issue</p> <p>East Herts has a long established tradition of restraint on inappropriate development within the Rural Area Beyond the Green Belt. This is a recognition that the environmental assets of the district require an equally protective policy framework and has ensured the protection of the smaller rural settlements, as well as the wider area of countryside.</p> <p>Policy GBR2 will be updated to reflect the latest approach to development in the villages.</p>
4.49	GBR2, Part II (e)	Since boundaries are being drawn around Group two villages this is effectively removing them from the Green Belt, hence there is no need to include part (e).	<p>No amendment in response to this issue</p> <p>This policy refers to villages outside of the Green Belt. The boundaries are not intended to be a limit to development, but were instead a tool defining the built-up part of the settlement within which limited infilling could be acceptable in line with a general approach of restraint within the rural area.</p>
Major Developed Sites			
4.50	4.3.1	The major developed site boundary for Van Hage's has not changed since the 2007 allocation. This boundary should be amended to include the existing built form (including the car park).	<p>No amendment in response to this issue</p> <p>The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. While there is no amendment in response to this issue in particular,</p>

Number	Paragraph /Policy	Issue raised through consultation	Officer Response
			Officers propose the removal of the MDS section.
4.51	4.3.3	HCC comments that it appears to be inconsistent that one school in Buntingford is an MDS whilst the other is not.	No amendment in response to this issue The town boundary will be redrawn in response to recent developments. Therefore Freman College would come within the built-up envelope of the town and will no longer be defined as a Major Developed Site in the rural area. This issue is considered in more detail in the Buntingford Issues Report and Settlement Appraisal.
4.52	GBR3	The University of Hertfordshire Campus at Bayfordbury should be included in the Major Developed Sites category. This will protect the existing campus and enhance its future capabilities.	No amendment in response to this issue The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Officers propose the removal of the MDS section. Regardless of this, the collection of buildings in use by the University is not conducive to being defined as a Major Developed Site. Apart from the teaching building, the built form is limited to glass houses and observatories, which are spread across the site. The former mansion and mews are not part of the university campus and the whole site falls within an extensive Grade 2 Listed Historic Park. Should the University wish to expand the campus facilities these would have to be mindful of other policy constraints in addition to Green Belt.
4.53	GBR3	Policy GBR3 duplicates NPPF but misinterprets elements, this is not consistent with NPPF.	Proposed amendment to Plan in response to this issue (Section 4.3) The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Officers propose the removal of the MDS section.
4.54	GBR3	Major Developed Sites have been removed from the NPPF so there is no requirement for this to still be a part of the District Plan.	Proposed amendment to Plan in response to this issue (Section 4.3) The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Officers propose the removal of the MDS section.
4.55	GBR3	Concern is raised that this policy is too restrictive with regards to the ability of schools to expand.	No amendment in response to this issue The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater

Number	Paragraph /Policy	Issue raised through consultation	Officer Response
			impact on the openness of the Green Belt or the purposes of including land within it, than the existing building. Officers propose the removal of the MDS section. Therefore, the impact of proposals will be dealt with on a case by case basis. The potential need to expand schools is considered to represent the 'very special circumstances' required to allow development within Green Belt areas. Proposals should therefore be pursued through the planning application process.
4.56	GBR3, Part II	The NPPF only requires consideration of proposals for infilling against openness.	<p>Proposed amendment to Plan in response to this issue (Section 4.3)</p> <p>The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Officers propose the removal of the MDS section.</p>
4.57	GBR3, Part II	Wording of the first line requires infilling to be small, the NPPF refers only to limited infilling and does not stipulate size.	<p>Proposed amendment to Plan in response to this issue (Section 4.3)</p> <p>The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Officers propose the removal of the MDS section.</p>
4.58	GBR3, Part II (b)	This requires height consideration to be taken into account, the NPPF does not stipulate that openness equates to height but rather each site should be considered individually (site specific factors).	<p>Proposed amendment to Plan in response to this issue (Section 4.3)</p> <p>The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it, than the existing development. Officers propose the removal of the MDS section. The NPPF requires that no greater impact on openness and other factors occurs. Height is clearly a factor to be considered along with mass and orientation when determining an application.</p>
4.59	GBR3 Part II (c)	This imposes specific constrains on development, but NPPF requires only that infilling should be limited.	<p>Proposed amendment to Plan in response to this issue (Section 4.3)</p> <p>The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Officers propose the removal of the MDS section.</p>
4.60	GBR3 Part III (a)	This requires that proposals should have less impact on openness. This goes beyond NPPF	<p>Proposed amendment to Plan in response to this issue (Section 4.3)</p>

Number	Paragraph /Policy	Issue raised through consultation	Officer Response
		which requires that proposals should not “have a greater impact”.	The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Officers propose the removal of the MDS section.
4.61	GBR3, Part III (b)	Part III (b) is too prescriptive, restricting the height could lead to harmful development where an alternative proposal could be more suitable. For example, where existing buildings are short and wide, taller and narrow buildings may be more appropriate.	Proposed amendment to Plan in response to this issue (Section 4.3) The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Officers propose the removal of the MDS section. The NPPF requires that no greater impact on openness and other factors occurs. Height is clearly a factor to be considered along with mass and orientation when determining an application.
4.62	GBR3 Part III (b) & (c)	The Local Planning Authority should as a minimum ensure that skyline development is avoided. Harmful impact might be limited by ensuring that higher land is public open space.	Proposed amendment to Plan in response to this issue (Section 4.3) The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Officers propose the removal of the MDS section. The NPPF requires that no greater impact on openness and other factors occurs. Height is clearly a factor to be considered along with mass and orientation when determining an application. The Design and Landscape chapter considers these issues in more detail. Through masterplanning it is possible to minimise the visual impact of development by defining uses that are appropriate for higher areas of land. Lower forms of development may be acceptable in some settings such as single storey buildings.
4.63	GBR, Part III (b) & (c)	These points do not have their root in national policy.	Proposed amendment to Plan in response to this issue (Section 4.3) The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Officers propose the removal of the MDS section. The NPPF requires that no greater impact on openness and other factors occurs. Height is clearly a factor to be considered along with mass and orientation when determining an application.

EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 25 AUGUST 2016

REPORT BY LEADER OF THE COUNCIL

EAST HERTS DRAFT DISTRICT PLAN – CHAPTER 6 – BUNTINGFORD: RESPONSE TO ISSUES RAISED DURING PREFERRED OPTIONS CONSULTATION

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

The purpose of this report is:

- To bring to Members' attention the issues raised through the Preferred Options consultation in connection with Chapter 6 (Buntingford) of the Draft District Plan Preferred Options version, together with Officer responses to those issues.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:	
(A)	the issues raised in respect of Chapter 6 (Buntingford) of the Draft District Plan Preferred Options, as detailed at Essential Reference Paper 'B' to this report, be received and considered; and
(B)	the Officer response to the issues referred to in (A) above, as detailed in Essential Reference Paper 'B' to this report, be agreed.

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.

- 1.2 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.
- 1.3 This report presents the Issue Report for Buntingford at **Essential Reference Paper 'B'**.
- 2.0 Report
- 2.1 The Issue Report summarises the issues raised through the Preferred Options Consultation and the issues are grouped according to the section of the Draft Plan they relate to. The table presents an officer response to each issue and sets out whether or not it is proposed that any subsequent proposed amendments to the text or policies of the draft Plan be made as a result.
- 2.2 As there have been significant advances in the technical evidence available to support the development strategy, and changes in local and wider circumstance since the publication of the Preferred Options version of the Draft Plan, it is considered appropriate that each of the settlement chapters be rewritten to take these factors into account rather than presenting a 'track change' iteration of the previous version. Therefore, unlike the approach taken for the Topic Chapters, the Issue Report for this Settlement Chapter does not specify a form of wording that any proposed amendment should take.
- 2.3 In consequence, it is likewise not proposed that amendments are shown in the form of 'track changes' for the settlement chapters. Instead, a revised chapter, which incorporates any proposed necessary amendments to the Plan identified in the Issue Report, will be brought before Members for consideration at the District Planning Executive Panel meeting on 8th September, along with the relevant Settlement Appraisal.
- 2.4 It should be noted that, for Buntingford, there have been significant changes since the Preferred Options consultation in 2014. Due to its position as the only town in the District that is not constrained by Green Belt, Buntingford has been subject to a number of speculative planning applications brought forward in advance of the adoption of the District Plan.

- 2.5 The proposed site allocation in the draft District Plan, BUNT2 South of Buntingford, has received planning permission for 316 dwellings and development has commenced on site. Therefore, it is Officers view that Policy BUNT2 is no longer required to be included in the Plan. However, it is considered that the policy relating to Employment in Buntingford (BUNT4 in draft District Plan) should be amended, with the 2 hectares of land provided as part of the planning permission being designated as an Employment Area, for B1(a), B1(c) and/or D1 uses.
- 2.6 The proposed site allocation in the draft District Plan, BUNT3 North of Buntingford, has received planning permission for 180 dwellings and development is due to commence on site shortly. In addition, two planning applications relating to the provision of specialist residential accommodation for the elderly on the site have been submitted to the Council. The first application for 25 retirement bungalows has recently been approved, whilst the second application for 37 retirement apartments is awaiting determination. Therefore, it is Officers view that Policy BUNT3 is no longer required to be included in the Plan.
- 2.7 Land north of Hare Street Road, land south of Hare Street Road and land east of Aspenden Road have all received planning permission on appeal for a total of 501 dwellings. The settlement boundary of the town will be amended to incorporate these sites.
- 2.8 Taking into account the amount of development that has been approved in Buntingford, as detailed above, and the response of HCC Property to the Preferred Options consultation, it is the view of Officers that a site allocation should be made for the development of a new first school. It is clear that the pupil yield arising from all approved development sites cannot be accommodated within the town's existing first schools, even taking account of their extension potential. Therefore, a new first school site will be required to ensure that there are sufficient places for the town's residents. This issue will be addressed through the Buntingford Settlement Appraisal which will be presented to the District Planning Executive Panel on 8th September.
- 2.9 Members are therefore invited to agree the Issue Report, as detailed in **Essential Reference Paper 'B'** to this report, as a basis for informing a redrafted chapter on Buntingford in the final 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:	Priority 1 – Improve the health and wellbeing of our communities Priority 2 – Enhance the quality of people's lives Priority 3 – Enable a flourishing local economy
Consultation:	The Report refers to the Draft District Plan consultation carried out between 27 th February and 22 nd May 2014.
Legal:	None
Financial:	None
Human Resource:	None
Risk Management:	None
Health and wellbeing – issues and impacts:	The 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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Issue Number	Issues raised through consultation	Officer Response
General Issues		
6.01	Buntingford Town Council, Anstey Parish Council, Buckland & Chipping Parish Council, Buntingford Civic Society, Buntingford Chamber of Commerce, Buntingford Action for Responsible Development (BARD), site promoters and others state that the Plan needs to be updated to take account of additional development granted planning permission on appeal.	<p>Proposed amendment to Plan in response to this issue</p> <p>Agreed. The Buntingford chapter and District Plan Policies Map will be updated to reflect the additional development granted planning permission in the town since 2014.</p>
6.02	Buntingford Town Council state that the town boundary should be redrawn to prevent further development in the Rural Area Beyond the Green Belt.	<p>Proposed amendment to Plan in response to this issue</p> <p>The settlement boundary of the town will be amended to incorporate site allocations from the Plan and the full extent of sites granted planning permission since 2014.</p>
6.03	It seems it has been predetermined that development in Buntingford will be sited in the proposed areas.	<p>No amendment to Plan in response to this issue</p> <p>Due to its position as the only town in the District that is not constrained by Green Belt, Buntingford has been subject to a number of speculative planning applications throughout the plan-making process. Therefore it is likely that the development strategy for Buntingford will be established through the planning application and development management process rather than the plan-making process, and development will have commenced on site prior to the adoption of the Plan.</p>
6.04	A site promoter states that as Buntingford is not located in the Green Belt, its expansion should be considered before releasing Green Belt land for development.	<p>No amendment to Plan in response to this issue</p> <p>Noted. The National Planning Policy Framework (NPPF) states at paragraph 84 that local planning authorities should consider the ‘consequences for sustainable development’ when producing a Plan. The overall development strategy for the District has emerged over a long period of time and has been subject to a sustainability appraisal. It is considered that a strategy which sought to direct higher levels of development to less sustainable locations beyond the Green Belt, purely in order to avoid otherwise suitable locations adjacent to the towns located within the Green Belt, would not</p>

Issue Number	Issues raised through consultation	Officer Response
		<p>comply with the NPPF.</p> <p>Notwithstanding this, the level of development proposed for Buntingford in the draft District Plan has already been exceeded through the granting of planning permission, both by the Council and by the Planning Inspectorate, to a number of speculative planning applications.</p>
6.05	No population projections in the Buntingford chapter whilst there is in other chapters.	<p>No amendment to Plan in response to this issue</p> <p>The format of the Buntingford chapter in the Plan is consistent with that of the other settlement chapters. It is possible that this comment relates to information regarding population projections and housing need contained within the Summary Document of the Plan. This information appears to have been omitted in error for Buntingford. However, these figures have now been superseded by an updated four-authority Strategic Housing Market Assessment (SHMA), which presents updated evidence regarding population projections and housing need.</p>
6.06	Buntingford Town Council, Buckland & Chipping Parish Council, Buntingford Civic Society, Buntingford Chamber of Commerce, Buntingford Action for Responsible Development (BARD), and others state that further development beyond what has already been approved would be clearly unsustainable. The town has already exceeded its capacity for new development to 2031.	<p>No amendment to Plan in response to this issue</p> <p>Due to its position as the only town in the District that is not constrained by Green Belt, Buntingford has been subject to a number of speculative planning applications throughout the plan-making process.</p> <p>Therefore, the sustainability of the town and the appropriateness of proposed development have been considered through the development management process as opposed to the plan-making process.</p> <p>A number of the planning applications submitted have been considered by the Planning Inspectorate following refusal of planning permission by the Council. To date, the decisions of the various planning Inspectors have been unanimous in concluding that the proposed developments amount to sustainable development having regard to the three-stranded definition</p>

Issue Number	Issues raised through consultation	Officer Response
		contained within the NPPF.
6.07	Buntingford Town Council, Buckland & Chipping Parish Council, Buntingford Civic Society, Buntingford Chamber of Commerce, Buntingford Action for Responsible Development (BARD) state that the proportion of windfall allowance should be specified as this is too open ended and Buntingford has already had to take far more housing than envisaged in the draft Plan.	<p>No amendment to Plan in response to this issue</p> <p>Windfall development is, by its nature, unplanned development so it is impossible to specify how much development will come forward in this way.</p>
6.08	Buntingford Action for Responsible Development (BARD) comment that a reduction in the proposed level and rate of housebuilding in the District as a whole would enable the scale of new housing proposals in Buntingford to be reduced, minimising the mismatch between the proposed increase in working population and availability of employment accessible by sustainable means of transport.	<p>No amendment to Plan in response to this issue</p> <p>The National Planning Policy Framework (NPPF) states at paragraph 47 that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed need for housing in the housing market area. The Council, and neighbouring local authorities within the housing market area, previously commissioned independent consultants to undertake a Strategic Housing Market Assessment (SHMA). This technical study identifies that the housing need in East Herts is at least 745 dwellings up to 2033 (16,390 new homes in total). In this respect, it is incumbent on the Council to ensure that the needs of the district are met.</p>
6.09	Most of the content of the plan is wishlists without specifics or evidence to support the content.	<p>No amendment to Plan in response to this issue</p> <p>The Plan is supported by an extensive evidence base which can be viewed at www.eastherts.gov.uk/districtplan.</p> <p>With regards to infrastructure, the Council continues to liaise with infrastructure and service providers in order to understand any capacity issues. An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered.</p>
6.10	Consultation process is a smoke screen and local people have little influence over centrally inspired projects.	<p>No amendment to Plan in response to this issue</p> <p>Whilst the Plan has been prepared in accordance with the National</p>

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		<p>Planning Policy Framework, the Plan sets out the local vision and strategic priorities for the area, together with district-wide and settlement specific policies on the homes and jobs needed in the area. A wide section of the community has been proactively engaged in the preparation of the Plan since its inception. All comments made through the consultation process are considered and amendments are made to the Plan where necessary.</p>
6.11	Use terminology in the Plan that is readily understood.	<p>No amendment to Plan in response to this issue</p> <p>The Council has made every effort to use language and terminology that is easily understood in the Plan. However, appropriate planning terminology has to be used in many circumstances. A glossary of terms is included in the Plan to assist the reader in this respect.</p>
6.12	Where is the evidence that Buntingford needs new homes? Buntingford has met its quota of homes already and should not need to provide further homes.	<p>No amendment to Plan in response to this issue</p> <p>The NPPF states that local planning authorities should seek to meet their full objectively assessed housing need. The Council, and neighbouring local authorities within the housing market area, previously commissioned independent consultants to undertake a Strategic Housing Market Assessment (SHMA). This technical study identifies that the housing need in East Herts is at least 745 dwellings up to 2033 (16,390 new homes in total).</p> <p>Proposed allocations emanating from this assessment have been made on the basis that provision should be balanced across the district where possible and delivered in the most sustainable locations. Therefore, in order to meet this challenging level of need, some development will be required in Buntingford.</p>
6.13	Slow sales of recently developed homes in Buntingford suggest a lack of demand for additional development.	<p>No amendment to Plan in response to this issue</p> <p>A slow sales rate of new development is more likely to be related to the prevailing economic climate than a lack of demand for housing. The fact that a number of national house builders are building homes in Buntingford suggests that they have market research</p>

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		which indicates a significant demand for housing in the town.
6.14	Housing development needs to be of a suitable scale, in the right place and with the sufficient infrastructure to support the additional population.	<p>No amendment to Plan in response to this issue</p> <p>Noted. The Plan seeks to ensure that housing development takes place in the most suitable locations in the District, i.e. where it is needed, where it is deliverable, and where it is sustainable.</p>
6.15	No consideration has been given to the housing type and mix required in Buntingford. Buntingford has an ageing population and this needs to be reflected in housing provision.	<p>No amendment to Plan in response to this issue</p> <p>Policy HOU1 of the Plan indicates that housing developments will be expected to provide an appropriate mix of housing tenures, types and sizes, taking account of the evidence contained within the latest Strategic Housing Market Assessment (SHMA) and other additional up to date evidence.</p> <p>The ageing population is not specific to Buntingford and is therefore an issue that needs to be considered on a district wide basis. Policies in the Housing Chapter of the Plan promote the delivery of housing that is suitable for older people. This includes the provision of smaller housing units, the provision of accessible and adaptable homes, and the provision of specialist forms of retirement accommodation.</p>
6.16	Housing type and mix should focus on the delivery of bungalows and 2 storey family homes on larger plots. Sheltered housing should be provided rather than affordable housing and care homes.	<p>No amendment to Plan in response to this issue</p> <p>Policy HOU1 of the Plan indicates that housing developments will be expected to provide an appropriate mix of housing tenures, types and sizes, taking account of the evidence contained within the latest Strategic Housing Market Assessment (SHMA) and other additional up to date evidence.</p> <p>Recently approved planning applications in Buntingford contain a wide variety of housing types, from small bungalows through to large detached houses, which are considered to cater for all sections of the community.</p> <p>Policies in the Housing Chapter of the Plan promote the delivery of</p>

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		specialist forms of retirement accommodation including sheltered housing and residential care homes.
6.17	Housing development should be of a lower density to reflect the rural nature of the town.	<p>No amendment to Plan in response to this issue</p> <p>Policy HOU2 of the Plan sets out the approach to be taken to the density of housing development. The policy sets out that housing density will vary according to the relative accessibility and character of the development location.</p>
6.18	Buntingford Action for Responsible Development (BARD) and others comment that Buntingford needs less 'standard' housing and more 'professional' housing to release the existing 'standard' stock.	<p>No amendment to Plan in response to this issue</p> <p>Policy HOU1 of the Plan indicates that housing developments will be expected to provide an appropriate mix of housing tenures, types and sizes, taking account of the evidence contained within the latest Strategic Housing Market Assessment (SHMA) and other additional up to date evidence.</p> <p>Recently approved planning applications in Buntingford contain a wide variety of housing types, from small bungalows through to large detached houses, which are considered to cater for all sections of the community.</p>
6.19	Consideration should be given to a predominance of 1 bedroomed bungalow style housing which would meet the requirements of an ageing population.	<p>No amendment to Plan in response to this issue</p> <p>Policy HOU1 of the Plan indicates that housing developments will be expected to provide an appropriate mix of housing tenures, types and sizes, taking account of the evidence contained within the latest Strategic Housing Market Assessment (SHMA) and other additional up to date evidence.</p> <p>The SHMA 2015 sets out that 9% of the housing need is for 1 bedroom units.</p> <p>Recently approved planning applications in Buntingford contain a wide variety of housing types, from small bungalows through to large detached houses, which are considered to cater for all sections of the community. A new policy in the Housing Chapter of the Plan, HOU7 Accessible and Adaptable Homes, requires the</p>

Issue Number	Issues raised through consultation	Officer Response
		provision of homes that are readily adaptable to meet the changing needs of their occupants over their lifetime and to support independent living.
6.20	Support the Plan considering the ageing population of the District and favouring 'Lifetime Homes'.	<p>No amendment to Plan in response to this issue</p> <p>Support noted and welcomed. However, the 'Lifetime Homes' standard has now been superseded by optional new national technical standards. Therefore, a new policy in the Housing Chapter of the Plan, HOU7 Accessible and Adaptable Homes, contains these national technical standards, to ensure the delivery of homes that are readily adaptable to meet the changing needs of their occupants over their lifetime and to support independent living.</p>
6.21	Need provision of more user-friendly residential care along the lines of the Rowntree Trust in York	<p>No amendment to Plan in response to this issue</p> <p>The Plan acknowledges that the district has an ageing population and policies within the Housing Chapter of the Plan promote a positive approach to providing a variety of residential options for older and vulnerable people.</p> <p>The delivery model for the provision of accommodation for older people has changed significantly over the years and there has been a marked shift to the delivery of flexi-care schemes and higher quality care home provision. Therefore, any schemes coming forward in Buntingford are likely to be influenced by this type of delivery model.</p>
6.22	Affordable housing should only be provided for local needs due to the lack of employment and public transport provision in the town. Affordable homes built at Crouch Gardens seem to be lived in predominantly by people who are not from Buntingford.	<p>No amendment to Plan in response to this issue</p> <p>The Strategic Housing Market Assessment (SHMA) identifies a significant need for additional affordable housing in East Herts. The key mechanism for securing affordable housing provision is by requiring developers to provide affordable housing as part of open market housing developments (through Section 106 Agreements).</p> <p>Policy HOU3 Affordable Housing seeks to maximise the delivery of</p>

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		<p>affordable housing with up to 40% provision being secured on eligible sites. This policy is applied district wide, across the towns and villages, to ensure that the maximum amount of affordable housing is delivered in the district.</p> <p>The Council's Housing Register and Allocations Policy sets out how the Council awards priority to applicants that wish to be considered for an affordable home. Local connection criteria are applied but this applies at a district wide level rather than at a settlement level, except in a small number of schemes where a Local Lettings Policy is applied. It is not considered that a Local Lettings Policy would be appropriate in Buntingford, which is one of the more sustainable settlements in the district.</p>
6.23	Even affordable homes in Buntingford are not affordable for ordinary people.	<p>No amendment to Plan in response to this issue</p> <p>The National Planning Policy Framework (NPPF) defines affordable housing as 'social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market'. In addition, the Government is currently in the process of amending the definition to include 'starter homes'. Therefore it is considered that there is a range of affordable housing tenures available to those whose needs are not met by the market.</p> <p>However it is acknowledged that changes introduced by the Government relating to the way that affordable homes are funded and delivered may have a detrimental impact on affordability of these homes. The Council's Housing team are working closely with Registered Providers to ensure that affordable homes provided for rent remain affordable for local residents on the Housing Register.</p>
6.24	Severe lack of affordable housing in the town.	<p>No amendment to Plan in response to this issue</p> <p>The Strategic Housing Market Assessment (SHMA) identifies a significant need for additional affordable housing in East Herts. The key mechanism for securing affordable housing provision is by requiring developers to provide affordable housing as part of open</p>

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		<p>market housing developments (through Section 106 Agreements).</p> <p>Policy HOU3 Affordable Housing seeks to maximise the delivery of affordable housing with up to 40% provision being secured on eligible sites. Therefore, it is anticipated that there will be significant delivery of affordable housing in the town over the Plan period.</p>
6.25	Registered numbers for affordable housing in Buntingford are only 30. Over provision of affordable housing will lead to Buntingford becoming a 'benefit town'.	<p>No amendment to Plan in response to this issue</p> <p>The Strategic Housing Market Assessment (SHMA) identifies a significant need for additional affordable housing in East Herts. Buntingford has been stated as a preferred location for housing by 352 applicants on the Housing Register (June 2016).</p> <p>Policy HOU3 Affordable Housing seeks to maximise the delivery of affordable housing with up to 40% provision being secured on eligible sites. This policy is applied district wide, across the towns and villages, to ensure that the maximum amount of affordable housing is delivered in the district.</p> <p>It is not considered appropriate to associate the delivery of affordable housing with the term 'benefit town'.</p>
6.26	Real need for homes for key workers such as teachers, nurses etc in this expensive area.	<p>No amendment to Plan in response to this issue</p> <p>The National Planning Policy Framework (NPPF) defines affordable housing as 'social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market'. In addition, the Government is currently in the process of amending the definition to include 'starter homes'. Therefore it is considered that there is a range of affordable housing tenures available to those whose needs are not met by the market, including key workers.</p>
6.27	Buntingford Action for Responsible Development (BARD) and others state that the 40% affordable housing requirement set by the Council across the district is not appropriate for Buntingford, a rural market town. Lack of employment opportunities in the town and lack of good access to	<p>No amendment to Plan in response to this issue</p> <p>The Strategic Housing Market Assessment (SHMA) identifies a significant need for additional affordable housing in East Herts. The key mechanism for securing affordable housing provision is by</p>

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	<p>employment opportunities further afield should be taken into account when considering the affordable housing requirement. Wessex Economics Employment Study indicates that lower income groups are more likely to depend on local jobs. Buntingford should have a reduced % requirement.</p>	<p>requiring developers to provide affordable housing as part of open market housing developments (through Section 106 Agreements).</p> <p>Policy HOU3 Affordable Housing seeks to maximise the delivery of affordable housing with up to 40% provision being secured on eligible sites. This policy is applied district wide, across the towns and villages, to ensure that the maximum amount of affordable housing is delivered in the district. Meeting affordable housing needs is a key element of the social element of sustainable development, and maximising the provision of affordable housing is identified within the Council's Corporate Strategic Plan.</p> <p>Buntingford is one of the more sustainable settlements in the district, and residents have access to a wide range of services and facilities within the town. It is acknowledged that there is a lack of employment opportunities in the town which leads to a net flow of out-commuting. However, this is true for all of the settlements in the District. 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.</p> <p>Notwithstanding this, policies in the Plan seek to increase the number of jobs available in Buntingford, and seek to improve the existing passenger transport system to nearby towns to enable residents to use sustainable transport options to access jobs in these locations.</p> <p>Therefore, it is not considered that reducing the affordable housing % requirement for Buntingford is appropriate as this would reduce the amount of affordable housing delivered in the District, contrary to paragraph 47 of the National Planning Policy Framework which states that local planning authorities should meet the full, objectively assessed needs for market and affordable housing.</p>
6.28	<p>Buntingford Action for Responsible Development (BARD) comment that reducing the % of affordable housing required would enable developers to create a design more appropriate to their location</p>	<p>No amendment to Plan in response to this issue</p> <p>The Strategic Housing Market Assessment (SHMA) identifies a significant need for additional affordable housing in East Herts.</p>

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		<p>Policy HOU3 Affordable Housing seeks to maximise the delivery of affordable housing with up to 40% provision being secured on eligible sites. This policy is applied district wide, across the towns and villages, to ensure that the maximum amount of affordable housing is delivered in the district.</p> <p>Policy DES3 within the Design and Landscape Chapter of the Plan states that all development proposals must be of a high standard of design and layout to reflect and promote local distinctiveness. This policy would apply regardless of the proportion of affordable housing provided on a site.</p>
6.29	Buntingford Action for Responsible Development (BARD) comment that reducing the % of affordable housing required would enable developers to accommodate the much needed employment floorspace needed to redress the current imbalance.	<p>No amendment to Plan in response to this issue</p> <p>The Strategic Housing Market Assessment (SHMA) identifies a significant need for additional affordable housing in East Herts. Policy HOU3 Affordable Housing seeks to maximise the delivery of affordable housing with up to 40% provision being secured on eligible sites. This policy is applied district wide, across the towns and villages, to ensure that the maximum amount of affordable housing is delivered in the district.</p> <p>Reducing the affordable housing % requirement would not necessarily result in the provision of more employment land. It is more likely to result in the provision of more market homes. The provision of employment land in Buntingford is considered through other policies in the Plan.</p>
6.30	Need to provide adequate residents' parking spaces in development schemes due to high car ownership levels in Buntingford.	<p>No amendment to Plan in response to this issue</p> <p>Noted. The Council's Vehicle Parking Standards have recently been revised, which will influence the amount of parking provided at new development in the future. It is important that adequate parking provision is made to avoid displacement parking, while providing the opportunities for sustainable travel options to encourage modal shift.</p>

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6.31	Would support the proposed development if, in advance of any homes being built, sufficient school places, doctors surgeries capacities, public transport provision and road network infrastructure are all put in place. This will lessen the burden and stress on current facilities and allow for a natural expansion and growth to be accepted in the future.	<p>No amendment to Plan in response to this issue</p> <p>The Council is fully aware that, in order to ensure the delivery of sites within the Plan, any necessary mitigating infrastructure must be identified and provided at the most appropriate time in the development process. The Plan should therefore seek to provide a suitable balance between conveying the requirement for infrastructure to be phased appropriately, without introducing unrealistic expectations about advance provision. Consequently, infrastructure delivery may not always be achieved prior to the commencement of development.</p> <p>An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered. Financial contributions towards the delivery of schemes have been secured through S106 legal agreements prepared alongside all of the recently approved planning applications.</p>
6.32	A site promoter states that Buntingford is a town capable of greater housing and employment expansion than is proposed, provided the infrastructure is improved proportionately, and its bus service connections to nearby towns are improved substantially.	<p>No amendment to Plan in response to this issue</p> <p>Noted. The Plan identifies Buntingford as a sustainable settlement with the services and facilities to accommodate development.</p> <p>Due to its position as the only town in the District that is not constrained by Green Belt, Buntingford has been subject to a number of speculative planning applications throughout the plan-making process. Therefore it is likely that the development strategy for Buntingford will be established through the planning application and development management process rather than the plan-making process, and as a consequence, a higher level of growth will occur than what was envisaged in the draft Plan.</p>
6.33	Buntingford Town Council, Buckland & Chipping Parish Council, Buntingford Civic Society, Buntingford Chamber of Commerce, Buntingford Action for Responsible Development (BARD) and others comment that vital infrastructure is already overstretched in terms of schools, doctors, and road usage. Infrastructure of town will struggle to cope with level of	<p>No amendment to Plan in response to this issue</p> <p>The Council continues to liaise with infrastructure and service providers in order to understand any capacity issues.</p>

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	development proposed and needs to be improved as a matter of urgency.	An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered. Financial contributions towards the delivery of schemes have been secured through S106 legal agreements prepared alongside all of the recently approved planning applications.
6.34	Anstey Parish Council, a site promoter and others are concerned about the lack of an infrastructure plan for the town.	No amendment to Plan in response to this issue An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered.
6.35	No developer contributions to infrastructure necessary to sustain their plans.	No amendment to Plan in response to this issue An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered. Financial contributions towards the delivery of schemes have been secured through S106 legal agreements prepared alongside all of the recently approved planning applications.
6.36	No information about how Council Tax receipts will be used for local infrastructure.	No amendment to Plan in response to this issue Council Tax receipts are used to pay for local services, as opposed to funding infrastructure.
6.37	As the resident population is now set to grow to a greater extent than originally foreseen, greater attention will need to be given to infrastructure development in Buntingford.	No amendment to Plan in response to this issue Noted. The Council continues to work with infrastructure and service providers to determine the impact of increased development on the town's existing infrastructure. An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered.
6.38	The size of the population reliant on the services and facilities is greater than the 5,000 people stated as the population of the wider hinterland is	No amendment to Plan in response to this issue Noted. The population of the wider hinterland that uses

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	14,000. This should be accounted for when considering the impact on the existing infrastructure.	Buntingford's services is being considered with regard to the impact on infrastructure.
6.39	HCC Property support paragraph 6.1.5 regarding the provision of middle and secondary education. However, these sites (Edwinstree Middle School and Freman College) should be included in the town boundary as this would assist in achieving planning permission for any development that would be required at these schools to enable the provision of additional school places to accommodate increased demand.	<p>Proposed amendment to Plan in response to this issue</p> <p>Noted. It is the view of Officers that the Buntingford settlement boundary should be amended to incorporate the school sites of Edwinstree Middle School and Freman College. It is proposed that the settlement boundary is extended to the A10. The Policies Map will be updated to show the amended settlement boundary.</p>
6.40	HCC Property comment that reference should be made to first schools in the last sentence of paragraph 6.1.5 as there is a three tier education system in operation in Buntingford.	<p>Proposed amendment to Plan in response to this issue</p> <p>Noted. Wording will be amended to make reference to 'first schools' rather than 'primary education'.</p>
6.41	HCC Property request that Layston First School should be included in the town boundary as this would assist in achieving planning permission for any development that would be required at the school to enable the provision of additional school places to accommodate increased demand.	<p>Proposed amendment to Plan in response to this issue</p> <p>Noted. It is the view of Officers that the Buntingford settlement boundary should be amended to incorporate the school site at Layston First School. It is proposed that the settlement boundary is extended to the eastern boundary of the school site. The Policies Map will be updated to show the amended settlement boundary.</p>
6.42	HCC Property confirm that the pupil yield from 753 new dwellings (1.5FE) would absorb all potential capacity available at the existing first schools in the town and therefore it would be prudent to plan for an additional first school site allocation to ensure long term need can be met.	<p>Proposed amendment to Plan in response to this issue</p> <p>Noted. It is the view of Officers that a site allocation should be made for the development of a new first school. It is clear that the pupil yield arising from all approved development sites cannot be accommodated within the town's existing schools and therefore a new first school will be required. This will be considered through the Buntingford Settlement Appraisal which will be presented to the District Planning Executive Panel on 8th September.</p>
6.43	HCC Property state that middle and upper schools in the school planning area are at capacity and oversubscribed. However, the schools have tended historically to attract pupils from outside the school planning area (Stevenage, Royston). To add more places at this point in time is likely to draw more pupils from those communities as there are sufficient places in	<p>No amendment to Plan in response to this issue</p> <p>Noted. It is considered that policies within the Plan provide the flexibility to develop school sites within Buntingford where possible and necessary.</p>

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	the Buntingford schools currently to cater for local demand from the existing community. HCC Property request policies within the District Plan that provide the flexibility to develop existing school sites where possible and necessary.	In addition, it is the view of Officers that the Buntingford settlement boundary should be amended to incorporate the school sites of Layston First School, Edwinstree Middle School and Freman College.
6.44	HCC Property state that the maximum size that Freman College could expand to in property terms is 9FE with the use of detached playing fields on the land to the north of the school.	No amendment to Plan in response to this issue Noted.
6.45	Buntingford Town Council, Anstey Parish Council, Buckland & Chipping Parish Council, Buntingford Civic Society, Buntingford Chamber of Commerce, Buntingford Action for Responsible Development (BARD) and others state that there is insufficient school capacity in the town at all levels to cope with additional development. Local children can no longer secure places in first or middle schools in Buntingford. More information is required within the Plan regarding the expansion of all schools.	Proposed amendment to Plan in response to this issue Noted. It is the view of Officers that a site allocation should be made for the development of a new first school. It is clear that the pupil yield arising from all approved development sites cannot be accommodated within the town's existing schools and therefore a new first school will be required. This will be considered through the Buntingford Settlement Appraisal which will be presented to the District Planning Executive Panel on 8 th September. With regard to middle and secondary education, HCC Property has advised that there is currently sufficient capacity within the Buntingford schools to cater for local demand from the existing community. The Council will continue to work closely with HCC in order to ensure that the educational needs arising from development in Buntingford can be met throughout the Plan period and the expansion of schools will form part of this process. An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered. Financial contributions towards the expansion of schools have been secured through S106 legal agreements prepared alongside all of the recently approved planning applications.
6.46	Children have to travel to Puckeridge for their education.	No amendment to Plan in response to this issue Noted. Puckeridge falls within the Buntingford school planning area and therefore it is considered acceptable to have some exchange

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		of pupils between the two settlements.
6.47	Children currently attend Buntingford schools from Walkern, Stevenage and Royston. School catchment areas need to be amended to ensure that children from Buntingford and surrounding villages can attend their local schools as more development will increase oversubscription of schools.	<p>No amendment to Plan in response to this issue</p> <p>Noted. As there is currently excess capacity at the middle and secondary levels of education in Buntingford, spaces are filled by students from outside the school planning area. As the population of Buntingford grows, pupils from within the town and surrounding villages will have admission priority over those pupils applying from further afield.</p>
6.48	Query as to whether Stevenage and North Herts have been consulted on the Plan as many students come from these districts to Buntingford for education purposes.	<p>No amendment to Plan in response to this issue</p> <p>Stevenage Borough Council and North Herts District Council have been consulted on the Plan as they are statutory consultees, being neighbouring authorities to East Herts.</p> <p>The Council has also held a series of meetings at both Officer and Member level with representative of the two Councils under the Duty to Co-operate.</p>
6.49	Need to consider increased special needs support from an increasing school population. Special needs support has increased since 100 affordable homes have been completed in the town.	<p>No amendment to Plan in response to this issue</p> <p>Noted. This is not directly a planning matter and cannot be taken into account in the plan-making process. HCC Children's Services department are responsible for ensuring that all children and young people with special educational needs and disability have access to educational provision that meets their needs.</p>
6.50	Buntingford Town Council, Anstey Parish Council, Buckland & Chipping Parish Council, Buntingford Civic Society, Buntingford Chamber of Commerce, Buntingford Action for Responsible Development (BARD) and others state that healthcare facilities in the town are at full capacity and further development will have a detrimental effect on existing facilities. Concern expressed at length of time it currently takes to get a medical appointment. New premises will be needed to facilitate expansion of the existing surgeries.	<p>No amendment to Plan in response to this issue</p> <p>The Council continues to liaise with NHS England, the East and North Hertfordshire Clinical Commissioning Group and other health providers in order to understand any capacity issues at GP surgeries and other healthcare facilities to ensure that appropriate provision can be made in Buntingford in relation to patients generated by new development.</p> <p>An Infrastructure Delivery Plan is currently being prepared which</p>

Issue Number	Issues raised through consultation	Officer Response
		will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered. Financial contributions to support the provision of general medical services in the town have been secured through S106 legal agreements prepared alongside all of the recently approved planning applications.
6.51	HCC Highways state that traffic from the proposed developments could be accommodated within the existing road network. However, if development proposals exceeded 1,000 dwellings there would be a highways impact on the A10 southbound. Further work would be needed to determine what mitigation measures would be required to support the cumulative impact of further development coming forward.	<p>No amendment to Plan in response to this issue</p> <p>A traffic model of Buntingford was produced by Steer Davies Gleave in 2015 to consider the cumulative impact of a number of approved and proposed developments on the town's road network. The modelling tested a number of future development scenarios and the results indicated that, in the most part, the road network can accommodate the new developments.</p> <p>However, operational issues were identified at a couple of locations and mitigation measures have been identified. HCC has undertaken a feasibility appraisal of the preferred mitigation measures to ascertain the potential cost of implementation and the Infrastructure Delivery Plan will include the mitigation measures identified in the Buntingford Transport Plan, where appropriate.</p> <p>The model also identified an ongoing issue with the capacity of the single carriageway section of the A10 south of the town with the conclusion that there should be a longer term aspiration to extend the dual carriageway section along this length. HCC is currently preparing its 'Hertfordshire 2050 Transport Vision' which is considering strategic mitigation schemes as part of its remit. It is likely that the dualling of the A10 south of Buntingford will be considered as part of this study. East Herts Council is fully engaged with, and contributing to, this process, as appropriate.</p>
6.52	HCC Highways state that access into development sites should be considered off the local roads rather than the A10.	<p>No amendment to Plan in response to this issue</p> <p>It is noted that the provision of new access points onto the A10 is contrary to HCC's primary route policy which does not permit new access onto the primary route network unless 'exceptional</p>

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		circumstances' can be demonstrated.
6.53	HCC Highways state that highway works and sustainable transport improvements should be identified as part of the planning application process.	<p>No amendment to Plan in response to this issue</p> <p>Agreed. Policy TRA1 Sustainable Transport sets out details of the sustainable transport initiatives required as part of development proposals.</p>
6.54	HCC Highways suggest that a comprehensive sustainable transport strategy be considered for Buntingford.	<p>No amendment to Plan in response to this issue</p> <p>The Council will continue to work with HCC to ensure that sustainable transport initiatives are secured through the planning application process. Given that a large number of development proposals have already secured planning permission and provided financial contributions to sustainable transport initiatives, it is not considered to be necessary to undertake a sustainable transport strategy at this time.</p>
6.55	Need to consider adequate access to the A10 from new developments as the roads are already extremely congested.	<p>No amendment to Plan in response to this issue</p> <p>A traffic model of Buntingford was produced by Steer Davies Gleave in 2015 to consider the cumulative impact of a number of approved and proposed developments on the town's road network. The modelling tested a number of future development scenarios and the results indicated that, in the most part, the road network can accommodate the new developments.</p> <p>However, operational issues were identified at a couple of locations and mitigation measures have been identified. HCC has undertaken a feasibility appraisal of the preferred mitigation measures to ascertain the potential cost of implementation and the Infrastructure Delivery Plan will include the mitigation measures identified in the Buntingford Transport Plan, where appropriate.</p>
6.56	Adequate vehicular access to Edwinstree School and Freman College and the A10 must be provided if the schools are expanded, without adding to congestion and parking problems at the beginning and end of the school day along Bowling Green Lane and surrounding residential streets. More	<p>No amendment to Plan in response to this issue</p> <p>A Highways Survey, assessing highways impact and vehicular and pedestrian access, would be carried out as part of feasibility work</p>

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	consideration should be given to providing for school coach parking.	<p>into school expansion options and to inform a planning application.</p> <p>In respect of term-time traffic, Hertfordshire County Council's Safe and Sustainable Journeys in Schools team work with schools, countywide, to encourage children and young people and their parents and carers to travel to school using active and sustainable modes. Further information on these initiatives can be found at: http://www.hertsdirect.org/services/transtreets/schtravel/</p> <p>The planning application approved for development north of Buntingford makes provision for a bus turning facility adjacent to Freman College where buses can drop off and collect students without the need to use Bowling Green Lane.</p>
6.57	Suggestion that a one-way system be developed around the schools and High Street.	<p>No amendment to Plan in response to this issue</p> <p>A traffic model of Buntingford was produced by Steer Davies Gleave in 2015 to consider the cumulative impact of a number of approved and proposed developments on the town's road network. The modelling tested a number of future development scenarios and the results indicated that, in the most part, the road network can accommodate the new developments.</p> <p>However, operational issues were identified at a couple of locations and mitigation measures have been identified. Development of a one way system around the schools and High Street has not been identified as a preferred mitigation measure.</p>
6.58	Addition of new homes will increase road usage especially where public transport provision is poor.	<p>No amendment to Plan in response to this issue</p> <p>Noted. A traffic model of Buntingford was produced by Steer Davies Gleave in 2015 to consider the cumulative impact of a number of approved and proposed developments on the town's road network. The modelling tested a number of future development scenarios and the results indicated that, in the most part, the road network can accommodate the new developments.</p> <p>However, operational issues were identified at a couple of locations</p>

Issue Number	Issues raised through consultation	Officer Response
		and mitigation measures have been identified. HCC has undertaken a feasibility appraisal of the preferred mitigation measures to ascertain the potential cost of implementation and the Infrastructure Delivery Plan will include the mitigation measures identified in the Buntingford Transport Plan, where appropriate.
6.59	Developers should be required to provide access directly to the A10.	<p>No amendment to Plan in response to this issue</p> <p>The provision of new access points onto the A10 is contrary to HCC's primary route policy which does not permit new access onto the primary route network unless 'exceptional circumstances' can be demonstrated.</p> <p>However, the approved planning application for development to the north of Buntingford includes a new access onto the A10 which is considered to be acceptable in principle by HCC Highways due to the closure of the existing access.</p>
6.60	Anstey Parish Council states that infrastructure contributions need to be sought from any new planning consents to improve the road links due to increased traffic movements.	<p>No amendment to Plan in response to this issue</p> <p>A traffic model of Buntingford was produced by Steer Davies Gleave in 2015 to consider the cumulative impact of a number of approved and proposed developments on the town's road network. The modelling tested a number of future development scenarios and the results indicated that, in the most part, the road network can accommodate the new developments.</p> <p>However, operational issues were identified at a couple of locations and mitigation measures have been identified. HCC has undertaken a feasibility appraisal of the preferred mitigation measures to ascertain the potential cost of implementation. Financial contributions to support the provision of mitigation measures to the road network have been secured through S106 legal agreements prepared alongside recently approved planning applications, where appropriate. All new development proposals will also be required to make appropriate financial contributions to mitigate the impact of development on the highway network.</p>

Issue Number	Issues raised through consultation	Officer Response
6.61	Need to relieve the excessive traffic between Buntingford and Baldock on the A507 and Buntingford and Royston on the A10, which are dangerous routes with numerous accidents recorded. This traffic will increase with more development and current traffic already travels at excessive speed. Improvements need to be made to these roads.	<p>No amendment to Plan in response to this issue</p> <p>Detailed transport modelling work is currently ongoing, working with neighbouring authorities where appropriate, in order to understand the potential impact of development on the strategic highway network, and any mitigation measures that may be required.</p> <p>Furthermore, HCC is currently preparing its 'Hertfordshire 2050 Transport Vision' which is considering strategic mitigation schemes as part of its remit. In addition, HCC monitor the statistics relating to accidents on the road network and safety improvement schemes are proposed if considered necessary.</p>
6.62	Removing the Little Hadham bottleneck by provision of a bypass runs the risk of attracting even more traffic to the A507 which is inadequate. Please detail the plans for improving safety and capacity of the A507 and A1.	<p>No amendment to Plan in response to this issue</p> <p>Detailed transport modelling work is currently ongoing, working with neighbouring authorities where appropriate, in order to understand the potential impact of development on the strategic highway network, and any mitigation measures that may be required.</p> <p>Furthermore, HCC is currently preparing its 'Hertfordshire 2050 Transport Vision' which is considering strategic mitigation schemes as part of its remit. East Herts Council is fully engaged with, and contributing to, this process, as appropriate.</p>
6.63	Anstey Parish Council and others state that improvements should be made to the A10. Dual carriageway needs to be extended to, at least, the Sainsbury's roundabout, preferably Baldock Road roundabout. Improvements need to be made to dangerous junctions at Westmill as this is an accident blackspot.	<p>No amendment to Plan in response to this issue</p> <p>A traffic model of Buntingford was produced by Steer Davies Gleave in 2015 to consider the cumulative impact of a number of approved and proposed developments on the town's road network. The modelling tested a number of future development scenarios and the results indicated that, in the most part, the road network can accommodate the new developments.</p> <p>The model identified an ongoing issue with the capacity of the single carriageway section of the A10 south of the town with the conclusion that there should be a longer term aspiration to extend the dual carriageway section along this length. HCC is currently</p>

Issue Number	Issues raised through consultation	Officer Response
		preparing its 'Hertfordshire 2050 Transport Vision' which is considering strategic mitigation schemes as part of its remit. It is likely that the dualling of the A10 south of Buntingford will be considered as part of this study. East Herts Council is fully engaged with, and contributing to, this process, as appropriate.
6.64	A site promoter argues that the lack of a commuter railway station in Buntingford is a positive advantage because more residents are likely to work locally, especially as more employment opportunities are developed in and around the town.	No amendment to Plan in response to this issue Noted. It is essential that more employment opportunities are developed in the town to create an enhanced opportunity for people to live and work locally.
6.65	Buntingford has one of the highest car usage/ownership with approximately 2.5 cars per household due to lack of railway and amenities.	No amendment to Plan in response to this issue Noted.
6.66	Buntingford Town Council, Anstey Parish Council, Buckland & Chipping Parish Council, Buntingford Civic Society, Buntingford Chamber of Commerce, Buntingford Action for Responsible Development (BARD) and others state that commuting by public transport is not practical due to a very limited bus service to all major towns, with no Sunday/Bank Holiday service. 331 and 700 bus services are infrequent, can run late and suffer from problems of overcrowding at certain times of the day.	No amendment to Plan in response to this issue It is acknowledged that Buntingford is predominantly served by the private car due to limited provision of passenger transport. Most bus services in Hertfordshire are run commercially by bus companies with HCC subsidising around 11% of services to fill some of the gaps in the commercial network. Notwithstanding this, new development proposals will be expected to provide financial contributions towards the provision of sustainable transport measures, which will include money to be used to improve and enhance the local bus service in Buntingford. It is considered that provision and support for sustainable transport measures which provide greater modal choice can help to facilitate a step change away from car use. Financial contributions towards sustainable transport measures have been secured through S106 legal agreements prepared alongside recently approved planning applications. This includes contributions towards the Buntingford Community Bus project, as well as contributions towards the improvement and enhancement of existing bus services, including the amending of routes and

Issue Number	Issues raised through consultation	Officer Response
		<p>increases in the frequency of service.</p> <p>These financial contributions will be expected to ensure the viability of this additional service provision in the initial years of their operation and help establish green travel patterns which are aimed at achieving modal shift. Patronage would subsequently need to be of a sufficient level to ensure services are retained.</p> <p>Furthermore, HCC is currently preparing its 'Hertfordshire 2050 Transport Vision' which is considering measures to encourage modal shift as part of its remit. East Herts Council is fully engaged with, and contributing to, this process, as appropriate.</p>
6.67	Concern raised that the 700 bus service will be cut when subsidies are removed.	<p>No amendment to Plan in response to this issue</p> <p>Noted. Financial contributions towards the improvement and enhancement of bus services will be expected to ensure the viability of this additional service provision in the initial years of their operation to help establish green travel patterns which are aimed at achieving modal shift. Patronage would subsequently need to be of a sufficient level to ensure services are retained.</p>
6.68	A site promoter states that sustainable transport contributions paid by developers will enable bus services to/from Buntingford to be improved.	<p>No amendment to Plan in response to this issue</p> <p>Noted and agreed.</p>
6.69	Many of the footpaths/rights of way to the east of town will be affected by housing. Difficult to see how walking and cycling will be promoted through a significant increase in facilities when this is the case.	<p>No amendment to Plan in response to this issue</p> <p>A new public right of way and improvements and alterations to existing routes have been secured by condition as part of the approved planning applications to the east of the town.</p> <p>A new section and policy regarding Public Rights of Way is to be inserted into Chapter 18 'Community Facilities, Leisure and Recreation' to ensure that routes are not adversely affected by development proposals.</p> <p>Policy TRA1 Sustainable Transport sets out details of the sustainable transport initiatives required as part of development</p>

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		<p>proposals, which includes the improvement of pedestrian links and cycle paths, in order to help deliver a modal shift away from car use in accordance with the NPPF.</p> <p>Financial contributions towards sustainable transport measures have been secured through S106 legal agreements prepared alongside recently approved planning applications. This includes money towards the provision of a cyclepath along London Road from the site south of Buntingford, northwards towards the town centre.</p>
6.70	Thames Water confirms that there may be a requirement for wastewater network improvements to support growth. For Buntingford STW the modelling will need to be re-run following receipt of an understanding of the final growth proposals for the catchment.	<p>No amendment to Plan in response to this issue</p> <p>Noted. While it is acknowledged that waste water services are an important issue it is considered that the issue has been addressed through the development management process rather than the plan-making process.</p>
6.71	Thames Water suggests that paragraph 6.1.7 should be revised to read 'improved utility infrastructure such as wastewater networks and enhanced broadband connectivity may be required will to support existing and new developments'.	<p>Proposed amendment to Plan in response to this issue</p> <p>Noted. Wording of paragraph to be revised in relation to wastewater infrastructure.</p>
6.72	Buntingford Town Council, Buckland & Chipping Parish Council, Buntingford Civic Society, Buntingford Chamber of Commerce, Buntingford Action for Responsible Development (BARD) and others state that existing sewage and water supplies will not be able to cope with all the additional homes planned for the town, and will need to be extended to cope with increased input.	<p>No amendment to Plan in response to this issue</p> <p>The Council has been working with Thames Water and relevant water providers to ensure that wastewater infrastructure and water supply are sufficient for the proposed levels of development. The issue of wastewater infrastructure has also been considered through the various planning applications.</p>
6.73	Some areas of the town experience problems with lack of water pressure.	<p>No amendment to Plan in response to this issue</p> <p>The issue of water supply is addressed by Water Resources Management Plans (WRMP) prepared by the water companies. WRMPs are approved by the Secretary of State. The Council will continue to engage with the relevant water providers. However, any existing issues with water pressure should be addressed outside of</p>

Issue Number	Issues raised through consultation	Officer Response
		the work being carried out on the District Plan.
6.74	Need more space for burials and cremations. It would be good to have a woodland burial space which would enhance the landscape.	<p>No amendment to Plan in response to this issue</p> <p>The Council does not currently have evidence that an identified need for such facilities exists in Buntingford. However, should such need be identified in the future then the emerging Open Space, Sports and Recreation Assessment will provide guidance on how any such facilities should be provided.</p>
6.75	Buntingford Town Council, Anstey Parish Council, Buckland & Chipping Parish Council, Buntingford Civic Society, Buntingford Chamber of Commerce, Buntingford Action for Responsible Development (BARD) and others stress that high speed broadband link is essential to facilitate business and employment growth in the town and surrounding villages.	<p>No amendment to Plan in response to this issue</p> <p>Agreed. The Plan contains Policy ED3 Communications Infrastructure which highlights the importance that the provision of high speed broadband plays in enabling individuals and businesses to work in more flexible ways.</p> <p>The Connected Counties programme is an established programme which works with BT to improve broadband connectivity across rural areas in Hertfordshire. Buntingford is included in the programmes second rollout phase, the Superfast Extension Programme (SEP). The indicative timetable for rollout can be viewed at http://www.connectedcounties.org/news/2015/may/superfast-extension-programme-confirmed-in-herts.</p>
6.76	Not enough employment land/opportunities in the town to meet the needs of the current residents of Buntingford, which means that residents have to commute by car and struggle with traffic congestion.	<p>No amendment to Plan in response to this issue</p> <p>Buntingford is one of the more sustainable settlements in the district, and residents have access to a wide range of services and facilities within the town. It is acknowledged that there is a lack of employment opportunities in the town which leads to a net flow of out-commuting. However, this is true for all of the settlements in the District. 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.</p> <p>Notwithstanding this, policies in the Plan seek to increase the</p>

Issue Number	Issues raised through consultation	Officer Response
		number of jobs available in Buntingford, and seek to improve the existing passenger transport system to nearby towns to enable residents to use sustainable transport options to access jobs in these locations.
6.77	Former Sainsbury's depot site should remain a designated employment site now that development proposals to the east of the town have been granted on appeal.	<p>No amendment to Plan in response to this issue</p> <p>The proposed allocation has now been granted planning permission and development has commenced on site. The issue of employment land provision was considered through the planning application process.</p>
6.78	Proposed hotel to north of Buntingford should be allowed to increase employment opportunities.	<p>No amendment to Plan in response to this issue</p> <p>It is not proposed to allocate this site in the District Plan. There are currently no firm proposals for the delivery of a hotel in this location, no evidence has been presented to the Council regarding the need for this facility and the Council could have problems in securing this exact use if the site were to be allocated for development. In addition, the Council have concerns about the suitability of this site for development, due to the impact on the landscape setting of the town.</p>
6.79	Query relating to the evidence that shows what leisure, services, jobs, shopping and amenities are required.	<p>No amendment to Plan in response to this issue</p> <p>The Plan is supported by an extensive evidence base which can be viewed at www.eastherts.gov.uk/districtplan.</p>
6.80	Query as to what the new employment area (star symbol) off the A10 Baldock Road roundabout is.	<p>No amendment to Plan in response to this issue</p> <p>The star symbol denotes the allocation of 3ha of land for the extension of the Buntingford Business Park.</p>
6.81	Agree with the proposed allocations to the north and south of the town but should consider a higher proportion of employment on the site south of Buntingford.	<p>No amendment to Plan in response to this issue</p> <p>Support noted and welcomed.</p> <p>The proposed allocation has now been granted planning permission and development has commenced on site. The issue of employment land provision was considered through the planning</p>

Issue Number	Issues raised through consultation	Officer Response
		application process.
6.82	Availability of local employment opportunities is particularly important to those who wish to work part time, those with lower skills and in lower paid work. Growth in the number of people who work in Buntingford will help support retail and service activities in the town centre.	<p>No amendment to Plan in response to this issue</p> <p>Noted. The Buntingford Employment Study 2014 states that the increase in the population of the town is likely to support an expansion in jobs in the consumer services sector, which are often entry level jobs with part time working opportunities.</p> <p>Agreed that a larger daytime population in the town will help sustain local retail and service activities, helping to maintain the viability of the town centre.</p>
6.83	A site promoter comments that paragraph 6.1.8 states that ‘additional employment land in the town will replace that lost through development...’ but comment that this will not be the case with regard to the development proposal on land south of Buntingford (BUNT2)	<p>Proposed amendment to Plan in response to this issue</p> <p>Noted. The wording of this paragraph will be amended to clarify the position on the provision of employment land.</p>
6.84	A site promoter states that the four proposed employment sites make no contribution to the loss of the existing Sainsbury’s designated employment area and second the need to create new opportunities for local employment in response to the growing workforce from the new homes to be built.	<p>No amendment to Plan in response to this issue</p> <p>The proposed allocation on land south of Buntingford has now been granted planning permission and development has commenced on site. The issue of employment land provision was considered through the planning application process. The approved planning application includes the provision of 2 hectares of land for employment purposes, which is in line with the recommendation set out in the Buntingford Employment Study 2014. The retention of the whole site for employment use was not suggested as part of this study, due to their being no realistic prospect of securing a single large business occupier for the site, and the demand for employment floorspace in Buntingford being relatively modest.</p> <p>Notwithstanding this, policies in the Plan seek to increase the number of jobs available in Buntingford, and seek to improve the existing passenger transport system to nearby towns to enable residents to use sustainable transport options to access jobs in these locations.</p>

Issue Number	Issues raised through consultation	Officer Response
6.85	Buntingford Action for Responsible Development (BARD) comment that there is not enough employment opportunities in the town or accessible by public transport. Buntingford Employment Study confirms the inadequacy and unsustainability of housing development without significant employment provision	<p>No amendment to Plan in response to this issue</p> <p>Buntingford is one of the more sustainable settlements in the district, and residents have access to a wide range of services and facilities within the town. It is acknowledged that there is a lack of employment opportunities in the town which leads to a net flow of out-commuting. However, this is true for all of the settlements in the District. 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.</p> <p>Notwithstanding this, policies in the Plan seek to increase the number of jobs available in Buntingford, and seek to improve the existing passenger transport system to nearby towns to enable residents to use sustainable transport options to access jobs in these locations.</p>
6.86	Query as to how development would reinforce the valley setting of the town when the town will be overlooked by development on the Wyddial Plateau	<p>No amendment to Plan in response to this issue</p> <p>The Inspector's decision regarding development proposals to the east of the town concluded that the proposals need not have an adverse impact on the character and appearance of the countryside or the landscape. The established belt of trees to the east of the development sites screens the areas proposed for residential development from view when in the wider Wyddial Plateau landscape area.</p> <p>Notwithstanding this, it is acknowledged that development will have an impact on the landscape around the town. The policies within the Plan seek to ensure that appropriate landscaping schemes are in place to lessen these impacts.</p>
6.87	Concern about loss of open spaces.	<p>No amendment to Plan in response to this issue</p> <p>The Plan includes a series of 'Guiding Principles', one of which identifies a need to prioritise the development of brownfield land. While the development strategy contained within the Plan does follow this important principle, it should be recognised that, due to</p>

Issue Number	Issues raised through consultation	Officer Response
		<p>the success of this approach in the Council's past adopted local plans, insufficient brownfield land remains available to meet the full housing needs of the district. Therefore, to meet the district's housing need, development on greenfield sites will be required.</p> <p>New development proposals will be expected to provide adequate and appropriately located open space, sport and recreation facilities, either on-site or through a financial contribution towards off-site provision.</p>
6.88	Difficult to see how the unique market town character of Buntingford can be sustained given the approval of significant developments.	<p>No amendment to Plan in response to this issue</p> <p>Policies in the Design & Landscape Chapter and the Heritage Assets Chapter seek to maintain and protect the historic character of the town.</p>
6.89	The valuable landscape surrounding the town has been taken away by the approved developments.	<p>No amendment to Plan in response to this issue</p> <p>It is acknowledged that development will have an impact on the landscape around the town. The policies within the Plan seek to ensure that appropriate landscaping schemes are in place to lessen these impacts.</p>
6.90	Historic England support the references to the preservation of Buntingford's market town character and respect for the quality of the town's historic core in new development.	<p>No amendment to Plan in response to this issue</p> <p>Support noted and welcomed.</p>
6.91	English Heritage recommends a thorough characterisation study be carried out to inform any options and strategies in the Plan. The Conservation Area, heritage assets and the town's setting should be referred to in the chapter. The need to protect the town's setting should be seen as a key factor in choosing possible directions of growth. Specific design policies relating to massing, scale and heights are appropriate to retain the town's local character.	<p>No amendment to Plan in response to this issue</p> <p>A Buntingford Conservation Area Appraisal and Management Plan has been completed and was adopted by the Council in June 2016. This is a comprehensive study including character analysis. These documents have been used to inform policies in the Plan and are a material consideration in development management decisions.</p> <p>It is considered that this section explains the importance of Buntingford's character and setting and the need for this to be preserved.</p>

Issue Number	Issues raised through consultation	Officer Response
		It is not considered that specific policies relating to design are necessary in the settlement chapters of the Plan. The Plan contains policies relating to Design and Heritage Assets which are applicable across the district. It is through the Neighbourhood Planning process that specific design policies relating to Buntingford can be proposed, if appropriate and supported by evidence.
6.92	Building on farmland will increase the risk of flooding within the town and surrounding villages.	<p>No amendment to Plan in response to this issue</p> <p>The Plan seeks to direct development to areas assessed as being at the lowest risk of flooding (Flood Zone 1).</p> <p>In respect of surface water or drainage flooding, proposed development will need to include sustainable drainage measures to ensure that new development maintain a run-off rate equivalent to that of undeveloped land.</p>
6.93	Road between Buntingford and Aspenden regularly floods, is too narrow and has footpaths which are too small.	<p>No amendment to Plan in response to this issue</p> <p>Noted. As part of the recent appeal decision for development at Aspenden Bridge, the road will be widened.</p>
6.94	Concern expressed that development will be permitted on floodplains.	<p>No amendment to Plan in response to this issue</p> <p>Policy WAT1 Flood Risk Management states that the functional floodplain will be protected from development. The Plan seeks to direct development to areas assessed as being at the lowest risk of flooding (Flood Zone 1).</p>
6.95	Construction should be limited to brownfield sites and not on agricultural land to assist with natural drainage and flood prevention. Any proposed site in the plan should be accompanied by a flood risk assessment.	<p>No amendment to Plan in response to this issue</p> <p>The Plan includes a series of 'Guiding Principles', one of which identifies a need to prioritise the development of brownfield land. While the development strategy contained within the Plan does follow this important principle, it should be recognised that, due to the success of this approach in the Council's past adopted local plans, insufficient brownfield land remains available to meet the full housing needs of the district. Therefore, to meet the district's</p>

Issue Number	Issues raised through consultation	Officer Response
		<p>housing need, development on greenfield sites will be required.</p> <p>The Plan seeks to direct development to areas assessed as being at the lowest risk of flooding (Flood Zone 1). Development proposals in areas at highest risk of flooding (Flood Zones 2, 3a or 3b) are required to submit a Flood Risk Assessment with the planning application.</p>
Development in Buntingford		
6.96	A site promoter objects to the failure of the Plan to allocate the land east of Buntingford (south of Hare Street Road) for residential development.	<p>Proposed amendment to Plan in response to this issue</p> <p>This site has now been granted planning permission on appeal. The settlement boundary of the town will be amended to incorporate the full extent of the site that has been granted planning permission.</p>
6.97	Buntingford Action for Responsible Development (BARD) state that further development should be limited to within the existing built up area of the town until 2031.	<p>No amendment to Plan in response to this issue</p> <p>Due to its position as the only town in the District that is not constrained by Green Belt, Buntingford has been subject to a number of speculative planning applications throughout the plan-making process. Therefore it is likely that the development strategy for Buntingford will be established through the planning application and development management process rather than the plan-making process, and development will have commenced on site prior to the adoption of the Plan.</p> <p>The settlement boundary of the town will be amended to incorporate site allocations from the Plan and the full extent of sites granted planning permission since 2014.</p>
6.98	A site promoter promotes 2.9ha of land north of Hare Street Road (adjacent to appeal site) for additional development.	<p>No amendment to Plan in response to this issue</p> <p>It is not proposed to allocate this site in the District Plan. The Inspector stated in his appeal decision for development of the site that the established tree belt to the east of the site formed a logical eastern boundary to development. It is considered that an</p>

Issue Number	Issues raised through consultation	Officer Response
		extension of development further east would have an unacceptable impact on the wider landscape of the Wyddial Plateau.
6.99	A site promoter states that further development proposals should be identified to the west of Buntingford which provides capacity for further housing growth and infrastructure provision. There is no physical space for provision of infrastructure on any of the permitted residential development sites. Suggest the Plan should include a new policy allocating the site for development.	<p>No amendment to Plan in response to this issue</p> <p>It is not proposed to allocate this site in the District Plan. The Buntingford Employment Study 2014 calculates an increase in the employed population of the town of 1,236 people, based on the building of all the development schemes that have obtained planning permission. If the site west of Buntingford were to be allocated for an additional 400 dwellings (as is proposed in the current planning application) the projected increase in the employed population of the town would be 1,624 people.</p> <p>The Study goes on to identify that the prospective job creation from the employment land identified in the Plan is just 1,110 jobs. Therefore, an increase in working population of 1,624 people is far in excess of the number of jobs that have the potential to be created in the town. It is considered that the allocation of an additional 400 dwellings without an accompanying growth in employment will lead to significant out commuting from the town by car, given the current provision of public transport in Buntingford, and this is not considered to be an environmentally sustainable outcome.</p> <p>It is acknowledged that the site has the potential to provide a site for a first school which HCC has identified as being required in the town. However, HCC have indicated that the first school is required to be operational from September 2019, and it is not considered that a first school is deliverable on the site within this time frame. Highways constraints prevent the school from being accessed from the existing road infrastructure. Therefore, a new access would be required onto the A10 which, although proposed as part of the planning application, has not been subject to any viability testing to assess delivery, and would not be able to be constructed within this time frame.</p>

Issue Number	Issues raised through consultation	Officer Response
6.100	A site promoter objects to wording of policy BUNT1 and comments that 1,500 dwellings should be the housing requirement for Buntingford to 2031.	<p>Proposed amendment to Plan in response to this issue</p> <p>Due to its position as the only town in the District that is not constrained by Green Belt, Buntingford has been subject to a number of speculative planning applications throughout the plan-making process. Therefore it is likely that the development strategy for Buntingford will be established through the planning application and development management process rather than the plan-making process, and development will have commenced on site prior to the adoption of the Plan.</p> <p>Policy BUNT1 and the settlement boundary of the town will be amended to incorporate site allocations from the Plan and the full extent of sites granted planning permission since 2014.</p>
6.101	A site promoter promotes land at Aspenden Bridge for development. Suggest the Plan should include a new policy allocating the site for development.	<p>Proposed amendment to Plan in response to this issue</p> <p>The site has now been granted planning permission on appeal. The settlement boundary of the town will be amended to incorporate the full extent of the site that has been granted planning permission.</p>
6.102	A site promoter objects to the failure of the Plan to allocate land at Aspenden Bridge (0.73ha south of Southview) for development for approximately 20 dwellings.	<p>Proposed amendment to Plan in response to this issue</p> <p>The settlement boundary of the town will be amended to incorporate the full extent of the site at Aspenden Bridge that has recently been granted planning permission on appeal. This will result in the site south of Southview also being incorporated within the settlement boundary of the town, enabling development to come forward on the site. Due to the limited quantum of development that is proposed for the site, it is not considered that it warrants a specific allocation within the Plan.</p>
6.103	Buntingford is let off lightly with just 500 homes.	<p>Proposed amendment to Plan in response to this issue</p> <p>Due to its position as the only town in the District that is not constrained by Green Belt, Buntingford has been subject to a number of speculative planning applications throughout the plan-making process. Therefore it is likely that the development strategy</p>

Issue Number	Issues raised through consultation	Officer Response
		<p>for Buntingford will be established through the planning application and development management process rather than the plan-making process, and development will have commenced on site prior to the adoption of the Plan.</p> <p>Policy BUNT1 and the settlement boundary of the town will be amended to incorporate site allocations from the Plan and the full extent of sites granted planning permission since 2014, which will result in higher number of dwellings being delivered.</p>
6.104	Acknowledge the need for housing and Buntingford has suitable areas to help meet this demand.	<p>No amendment to Plan in response to this issue</p> <p>Noted.</p>
6.105	Buntingford Town Council, Buckland & Chipping Parish Council, Buntingford Civic Society, Buntingford Chamber of Commerce and Buntingford Action for Responsible Development (BARD) state that the policies for affordable housing, parking standards, open space etc. should be based on local considerations and requirements and set out in Neighbourhood Plans.	<p>No amendment to Plan in response to this issue</p> <p>The District Plan is a strategic document which is the key to delivering sustainable development that reflects the vision and aspirations of local communities. Neighbourhood Planning offers local people the opportunity to formulate policies specific to their Neighbourhood Area. However these policies need to be in general conformity with the policies of the District Plan and would need to be based on appropriate evidence.</p>
6.106	Buntingford Town Council, Anstey Parish Council, Buckland & Chipping Parish Council, Buntingford Civic Society, Buntingford Chamber of Commerce and Buntingford Action for Responsible Development (BARD) state that the quality of life for existing residents must not be adversely affected by the planned growth in population	<p>No amendment to Plan in response to this issue</p> <p>Agreed.</p>
South of Buntingford		
6.107	Former Sainsbury's Depot site will have severe contamination issues which will reduce viability of development on site and therefore an inferior quality of development will be delivered.	<p>No amendment to Plan in response to this issue</p> <p>The proposed allocation has now been granted planning permission and development has commenced on site. The issue of site contamination was considered through the planning application process.</p>

Issue Number	Issues raised through consultation	Officer Response
6.108	Concern expressed as to how residential development of the former Sainsbury's Depot site will affect traffic and utilities both during and after construction.	<p>No amendment to Plan in response to this issue</p> <p>The proposed allocation has now been granted planning permission and development has commenced on site. The issue of traffic and utilities was considered through the planning application process.</p>
6.109	Buntingford Action for Responsible Development (BARD) agrees with the conclusion of the Wessex Economics Employment Study in that the former Sainsbury's Depot site is the best location for further development of employment floorspace in the town.	<p>No amendment to Plan in response to this issue</p> <p>Noted. The proposed allocation has now been granted planning permission and development has commenced on site. The issue of employment land provision was considered through the planning application process. The approved planning application includes the provision of 2 hectares of land for employment purposes.</p>
6.110	Buntingford Action for Responsible Development (BARD), a site promoter and others object to the policy on the basis that a significantly larger part of the site should be retained for employment use in the interests of the long term sustainability of the town.	<p>No amendment to Plan in response to this issue</p> <p>The proposed allocation has now been granted planning permission and development has commenced on site. The issue of employment land provision was considered through the planning application process.</p> <p>The Buntingford Employment Study 2014 recommended that 2-3 hectares of land for employment purposes be retained on the former Sainsbury's Depot site. The approved planning application includes the provision of 2 hectares of land for employment purposes.</p>
6.111	Buntingford Town Council, Buckland & Chipping Parish Council, Buntingford Civic Society, Buntingford Chamber of Commerce and Buntingford Action for Responsible Development (BARD) state that the policy should be amended to include the provision of an appropriate % of employment land for B1 and B2 use. This should be provided at a strategic point in the development of the site to ensure that this is not left until the residential development has been provided.	<p>No amendment to Plan in response to this issue</p> <p>The proposed allocation has now been granted planning permission and development has commenced on site. The issue of employment land provision was considered through the planning application process. The approved planning application includes the provision of 2 hectares of land for employment purposes.</p> <p>The S106 legal agreement requires the submission of a Business and Employment Strategy for the marketing of the 2 hectares of employment land for the approved uses, to ensure that the</p>

Issue Number	Issues raised through consultation	Officer Response
		employment land is effectively promoted and marketed for development.
6.112	Conditions should be placed on the developer of the Sainsbury's site that they ensure that the employment area is effectively promoted and marketed.	<p>No amendment to Plan in response to this issue</p> <p>Agreed. The S106 legal agreement requires the submission of a Business and Employment Strategy for the marketing of the 2 hectares of employment land for the approved uses, to ensure that the employment land is effectively promoted and marketed for development.</p>
6.113	Anstey Parish Council considers that the site south of Buntingford should not be bought forward for development in this Plan period due to the two other major sites already in the planning process.	<p>No amendment to Plan in response to this issue</p> <p>The proposed allocation has now been granted planning permission and development has commenced on site.</p>
6.114	Buntingford Town Council, Buckland & Chipping Parish Council, Buntingford Civic Society, Buntingford Chamber of Commerce and Buntingford Action for Responsible Development (BARD) state that the policy should be more specific about improvements required to the Bury Football Club.	<p>No amendment to Plan in response to this issue</p> <p>The proposed allocation has now been granted planning permission and development has commenced on site.</p>
6.115	Buntingford Town Council, Buckland & Chipping Parish Council, Buntingford Civic Society, Buntingford Chamber of Commerce and Buntingford Action for Responsible Development (BARD) state that the policy should make reference to the density of development being 30 dwellings per hectare.	<p>No amendment to Plan in response to this issue</p> <p>The proposed allocation has now been granted planning permission and development has commenced on site.</p>
6.116	Buntingford Town Council, Buckland & Chipping Parish Council, Buntingford Civic Society, Buntingford Chamber of Commerce and Buntingford Action for Responsible Development (BARD) state that the policy should be more specific with regard to enhanced passenger transport services and should include 'Hopper' buses to link developments to other areas of the town.	<p>No amendment to Plan in response to this issue</p> <p>The proposed allocation has now been granted planning permission and development has commenced on site.</p> <p>The S106 legal agreement requires a financial contribution towards the Buntingford Community bus project.</p>
6.117	The site promoter supports the allocation of the site for mixed use redevelopment but believe allocation will become unnecessary on the assumption that planning permission will be granted for the proposed	<p>Proposed amendment to Plan in response to this issue</p> <p>Agreed. As the proposed allocation has now been granted planning permission, it is Officers view that Policy BUNT2 – South of</p>

Issue Number	Issues raised through consultation	Officer Response
	scheme.	Buntingford is no longer required to be included in the Plan. However, the policy relating to Employment in Buntingford (BUNT4 in draft Plan) will be amended to include further reference to the 2 hectares of employment land provided as part of the planning permission.
6.118	The site promoter objects to various aspects of the policy wording of BUNT2 with particular reference made to the quantum of development to be allocated on the site.	No amendment to Plan in response to this issue The proposed allocation has now been granted planning permission and development has commenced on site.
6.119	The site promoter objects to any suggestion that a greater proportion of the site should be allocated for employment development to meet the longer term needs of Buntingford.	No amendment to Plan in response to this issue The proposed allocation has now been granted planning permission and development has commenced on site. The issue of employment land provision was considered through the planning application process. The Buntingford Employment Study 2014 recommended that 2-3 hectares of land for employment purposes be retained on the site. The approved planning application includes the provision of 2 hectares of land for employment purposes.
6.120	The site promoter objects to the requirement of a development brief or masterplan to be prepared or approved by the District Council, outside of the planning application process.	No amendment to Plan in response to this issue The proposed allocation has now been granted planning permission and development has commenced on site.
6.121	Thames Water comment that on the information available to date, they do not envisage infrastructure concerns regarding waste water capability in relation to this site.	No amendment to Plan in response to this issue The proposed allocation has now been granted planning permission and development has commenced on site. The issue of wastewater infrastructure was considered through the planning application process.
6.122	HCC Property support clauses (j), (k) and (l) of the policy	No amendment to Plan in response to this issue Support noted and welcomed. The proposed allocation has now been granted planning permission and development has

Issue Number	Issues raised through consultation	Officer Response
		commenced on site.
North of Buntingford		
6.123	Ensure bungalows/houses suitable for older generation are provided on land north of Buntingford.	<p>No amendment to Plan in response to this issue</p> <p>The majority of the proposed allocation has now been granted planning permission, with planning applications awaiting determination for the remainder of the site.</p> <p>The approved planning application includes the provision of bungalows and the planning applications awaiting determination are for the provision of sheltered accommodation for older people.</p>
6.124	Buntingford Town Council, Buckland & Chipping Parish Council, Buntingford Civic Society, Buntingford Chamber of Commerce and Buntingford Action for Responsible Development (BARD) state that the policy should be more specific with regard to enhanced passenger transport services and should include 'Hopper' buses to link developments to other areas of the town.	<p>No amendment to Plan in response to this issue</p> <p>The majority of the proposed allocation has now been granted planning permission, with planning applications awaiting determination for the remainder of the site. The issue of sustainable transport measures was considered/will be considered through the planning application process</p> <p>Financial contributions towards sustainable transport measures have been secured through S106 legal agreements prepared as part of the recently approved planning application. This includes money to be used to improve and enhance the local bus service in Buntingford, including the amendment of the 331 bus route and an increase in service provision.</p>
6.125	Objection to New Homes Bonus going to Cottered Parish Council	<p>No amendment to Plan in response to this issue</p> <p>This is not a planning matter and cannot be taken into account in the plan-making process.</p> <p>Buntingford Town Council and Cottered Parish Council are both part of the Buntingford Community Area which is in the process of completing a Neighbourhood Plan. East Herts Council encourage Buntingford Town Council and Cottered Parish Council to work</p>

Issue Number	Issues raised through consultation	Officer Response
		together to agree how monies secured through the New Homes Bonus are used for the benefit of the Buntingford Community Area.
6.126	Concern expressed as to how residents of the proposed old peoples home will get to the town and integrate.	<p>No amendment to Plan in response to this issue</p> <p>It is acknowledged that public transport is currently limited within the vicinity of the site.</p> <p>Financial contributions towards sustainable transport measures have been secured through S106 legal agreements prepared as part of the recently approved planning application. This includes money to be used to amend the route of the 331 service through the site.</p>
6.127	HCC Minerals consider that there may be the opportunity to extract resources for use on site during development	<p>No amendment to Plan in response to this issue</p> <p>The majority of the proposed allocation has now been granted planning permission, with planning applications awaiting determination for the remainder of the site. The issue of the re-use of existing materials within the new development has been considered by way of a condition as part of the decision notice for the approved planning application.</p>
6.128	Historic England would like to see the policy make a reference to the need to protect, and enhance the setting of the heritage assets to the north at Corneybury, including the Grade II* listed Corneybury Manor House.	<p>No amendment to Plan in response to this issue</p> <p>The majority of the proposed allocation has now been granted planning permission, with planning applications awaiting determination for the remainder of the site. The issue of heritage assets was considered as part of the planning application process.</p>
6.129	Thames Water comment that they have some concerns regarding waste water services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. Thames Water requested the insertion of specific wording in the policy.	<p>No amendment to Plan in response to this issue</p> <p>The majority of the proposed allocation has now been granted planning permission, with planning applications awaiting determination for the remainder of the site. The issue of wastewater has been considered by way of a condition as part of the decision notice for the approved planning application.</p>

Issue Number	Issues raised through consultation	Officer Response
6.130	The site promoter considers that the site allocation should be amended to reflect the location of the approved development.	<p>Proposed amendment to Plan in response to this issue</p> <p>Agreed. The settlement boundary of the town will be amended to reflect the location of the approved residential development.</p>
6.131	The site promoter objects to the policy wording and suggests that an additional criterion be added stating that the site could provide for a new medical facility for the town.	<p>No amendment to Plan in response to this issue</p> <p>The majority of the proposed allocation has now been granted planning permission, with planning applications awaiting determination for the remainder of the site. The issue of health provision has been considered through the planning application process. Financial contributions to support the provision of general medical services in the town have been secured through S106 legal agreements prepared alongside all of the recently approved planning applications. It is envisaged that this will be spent on the extension of existing premises rather than the provision of new premises.</p>
6.132	The site promoter suggests that further criteria should be added stating that additional land to the north west of the site should be allocated for a new hotel to provide further facilities for the town and to deliver jobs.	<p>No amendment to Plan in response to this issue</p> <p>It is not proposed to allocate this site in the District Plan. There are currently no firm proposals for the delivery of a hotel in this location, no evidence has been presented to the Council regarding the need for this facility and the Council could have problems in securing this exact use if the site were to be allocated for development. In addition, the Council have concerns about the suitability of this site for development, due to the impact on the landscape setting of the town.</p>
6.133	A site promoter suggests additional wording be added to Policy BUNT3 regarding new access onto A10.	<p>No amendment to Plan in response to this issue</p> <p>The majority of the proposed allocation has now been granted planning permission, with planning applications awaiting determination for the remainder of the site. The issue of the new access onto the A10 was considered through the planning application process.</p>

Issue Number	Issues raised through consultation	Officer Response
6.134	HCC Property support clauses (k), (l) and (m) of the policy.	<p>No amendment to Plan in response to this issue</p> <p>Support noted and welcomed. The proposed allocation has now been granted planning permission.</p>
Employment in Buntingford		
6.135	Anstey Parish Council supports the policy.	<p>No amendment to Plan in response to this issue</p> <p>Support noted and welcomed.</p>
6.136	Buntingford Town Council, Buckland & Chipping Parish Council, Buntingford Civic Society, Buntingford Chamber of Commerce and Buntingford Action for Responsible Development (BARD) consider that the policy should state that no further planning permission for significant traffic generating developments will be granted on the Watermill Industrial Estate until improvement works have been carried out on Aspenden Road as per the policy contained in the Local Plan 2007	<p>Proposed amendment to Plan in response to this issue</p> <p>The partial widening of Aspenden Road has been secured through the granting of planning permission on appeal for the site at Aspenden Bridge. However, a narrow section of road would still remain.</p> <p>Therefore, it is proposed to amend the policy wording and supporting text to Policy BUNT4 Employment in Buntingford, to ensure that trip generation rates and their impact on the highway network are adequately considered through any planning applications received for additional development at the Watermill Industrial Estate.</p>
6.137	Buntingford Action for Responsible Development (BARD) express concern that the Wessex Economics Employment Study commissioned by the Council seems to focus on maximising the potential housing and employment provision that might be accommodated, and does not take other planning constraints such as infrastructure capacity issues into account.	<p>No amendment to Plan in response to this issue</p> <p>The Buntingford Employment Study 2014, as the title suggests, is solely concerned with employment matters and is just one of a raft of evidence based documents that support the production of the Plan. All evidence based documents will be considered in the formulation of a sustainable development strategy for the District.</p>
6.138	Buntingford Action for Responsible Development (BARD) comment that there is a lack of capacity for the physical expansion of shops, offices and other town centre services because of the character and street layout of the Conservation Area and presence of listed buildings, compounded by a decade of residential infill and conversions.	<p>No amendment to Plan in response to this issue</p> <p>Noted. There has been concern raised regarding the loss of retail provision in Buntingford and it is considered that an increase in population of the town will help sustain these local services and facilities.</p>

Issue Number	Issues raised through consultation	Officer Response
6.139	Buntingford Action for Responsible Development (BARD) does not agree with the Wessex Economics Employment Study conclusion on the overall employment potential for additional development at the proposed extension to Buntingford Business Park because of the type of potential occupier there	<p>No amendment to Plan in response to this issue</p> <p>The Buntingford Employment Study is an evidence based document commissioned to support the production of the District Plan and is not, itself, subject to consultation.</p> <p>Notwithstanding this, the Council consider that the Buntingford Business Park extension can accommodate a range of potential occupiers, across a range of unit sizes, although it is noted that a bias towards B8 and B2 users currently exists.</p>
6.140	Buntingford Action for Responsible Development (BARD) does not agree with the Wessex Economics Employment Study conclusion on the overall employment potential for the remaining capacity at Park Farm now that the Council has permitted vacant employment land to be developed for housing	<p>No amendment to Plan in response to this issue</p> <p>The Buntingford Employment Study is an evidence based document commissioned to support the production of the District Plan and is not, itself, subject to consultation.</p> <p>Notwithstanding this, the Council consider that there remains expansion potential to Park Farm Industrial Estate, with access being provided through the existing industrial estate. The majority of the site permitted for residential development did not form part of the designated employment area, but was an area allocated for the provision of live/work units. Despite extensive marketing of the site for this purpose, there has been little interest in bringing forward the site for live/work units. Therefore, planning permission was granted for the development of open market housing.</p>
6.141	Buntingford Action for Responsible Development (BARD) and a site promoter comment that an element of the new workforce from the new dwellings needs to be accommodated in the town, to be sustainable. The Plan does not adequately address the employment needs of the expanding population and the further existing imbalance of net out commuting.	<p>No amendment to Plan in response to this issue</p> <p>Noted. It is acknowledged that there is a lack of employment opportunities in the town which leads to a net flow of out-commuting. However, this is true for all of the settlements in the District. 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.</p> <p>Notwithstanding this, policies in the Plan seek to increase the number of jobs available in Buntingford, through the retention of</p>

Issue Number	Issues raised through consultation	Officer Response
		existing employment areas, where appropriate, and the allocation of new employment land. An increase in the population of the town is also likely to support an expansion in jobs in the consumer services sector.
6.142	A site promoter objects to land adjoining Park Farm Industrial Estate being included within the designated employment area. The land has been undeveloped for 13 years, and marketed for employment use since 2007. The site should be allocated for housing development.	<p>No amendment to Plan in response to this issue</p> <p>Disagree. The Buntingford Employment Study 2014 highlights that the existing units on the Park Farm Industrial Estate have a high level of occupancy, which indicates that it is meeting a real need for employment space in the town. The Plan proposes that land to the north of the existing industrial estate remains allocated for employment uses, with access being provided through the existing estate. The Buntingford Employment Study concludes that there is a good prospect of this site being developed either for small business units or possibly a larger single unit over the Plan period. The Council considers that it is essential to retain this employment land to create an enhanced opportunity for people to live and work locally.</p>
6.143	A site promoter comments that the former Sainsbury's depot should remain as an employment allocation.	<p>No amendment to Plan in response to this issue</p> <p>Noted. The former Sainsbury's Depot site has now been granted planning permission and development has commenced on site. The issue of employment land provision was considered through the planning application process. The approved planning application includes the provision of 2 hectares of land for employment purposes.</p>
6.144	A site promoter suggests that a further employment area of 18.5ha be allocated for B8 use on land to the opposite side of the former Sainsbury's Depot roundabout.	<p>No amendment to Plan in response to this issue</p> <p>It is not proposed to allocate this site in the District Plan. The development of this site for B8 employment use would result in an unacceptable incursion into the countryside south of the town.</p>
Retail in Buntingford		

Issue Number	Issues raised through consultation	Officer Response
6.145	Buntingford Town Council, Buckland & Chipping Parish Council, Buntingford Civic Society, Buntingford Chamber of Commerce and Buntingford Action for Responsible Development (BARD) state that the town centre is capable of little expansion and S106/CIL monies must be used to provide an attractive shopping/community experience which is able to cope with an increasing number of vehicles and pedestrians.	<p>No amendment to Plan in response to this issue</p> <p>Noted. There is the potential to secure financial contributions towards enhancing the public realm of the town through a S106 agreement. However, this would need to be addressed at the planning application stage and be supported by evidence. It is considered that this is an issue that could be addressed through the Neighbourhood Plan.</p>
6.146	The town does not have a high provision of retail outlets as suggested in the Plan. Only approx. 36 shops serving 14,000 surrounding residents.	<p>No amendment to Plan in response to this issue</p> <p>It is not clear where reference is made to Buntingford having a high provision of retail outlets. Buntingford High Street is designated as a minor town centre in the Plan, in recognition of its size and its relatively limited retail offer. However, the increase in population in the town will help sustain local retail and service activities, helping to maintain the viability of the town centre.</p>
6.147	Town has limited retail and leisure outlets which results in a large outflow of mainly car transport to other towns. This will worsen with more housing developments in Buntingford.	<p>No amendment to Plan in response to this issue</p> <p>Noted. The residents of Buntingford have access to a wide range of day-to-day services and facilities within the town. The increase in population of the town will help sustain these local services and facilities. However, it is acknowledged that residents will have to travel to neighbouring urban areas to fulfil some of their retail and leisure needs.</p>
6.148	A site promoter believes that increasing the monthly spend in Buntingford High Street will help in sustaining the economic vitality of the town.	<p>No amendment to Plan in response to this issue</p> <p>Agreed. It is considered that the increase in population in the town will help sustain local retail and service activities, helping to maintain the viability of the town centre.</p>
6.149	Car parking would need to be addressed to cope with extra influx of vehicles.	<p>No amendment to Plan in response to this issue</p> <p>The Council does not currently have evidence that additional car parking would need to be provided. The development proposals in the town are all located within walkable distance of the High Street for an able bodied person. It is important that adequate parking</p>

Issue Number	Issues raised through consultation	Officer Response
		provision is made to avoid displacement parking, while providing the opportunities for sustainable travel options to encourage modal shift.
Leisure and Community Facilities in Buntingford		
6.150	Buntingford Town Council, Buckland & Chipping Parish Council, Buntingford Civic Society, Buntingford Chamber of Commerce and Buntingford Action for Responsible Development (BARD) state that the Plan does not address the deficit of green open space within the town.	<p>No amendment to Plan in response to this issue</p> <p>In respect of the evidence underpinning the identification of needs, it should be noted that work is currently ongoing in the preparation of an updated Open Space, Sport and Recreation Assessment. The updated evidence will inform the identification of needs going forward and the level and location of provision in Buntingford.</p> <p>Notwithstanding this, new development proposals will be expected to provide adequate and appropriately located open space, sport and recreation facilities, either on-site or through a financial contribution towards off-site provision.</p> <p>The provision of a range of on-site open space types has been secured through S106 legal agreements prepared alongside all of the recently approved planning applications. In addition, financial contributions to off-site provision have also been secured.</p> <p>A significant amount of open space provision (6 hectares) has been secured on land to the west of the site north of Buntingford. This includes an extensive area of parkland amenity space and the provision of outdoor sports facilities. The Policies Map will be updated to designate this open space provision under policy CFLR1.</p>
6.151	Sport England welcome acknowledgement of the relative lack of open spaces for sport but object to the absence of specific proposals within the Plan, such as site allocations to address these deficiencies. Unless the Plan identifies suitable sites it is considered unlikely that the deficiencies will be met due to land values for alternative uses being considerably greater. It is considered unlikely that the sites allocated for residential led development will be large enough to provide viable on-site sports facilities.	<p>No amendment to Plan in response to this issue</p> <p>In respect of the evidence underpinning the identification of needs, it should be noted that work is currently ongoing in the preparation of an updated Open Space, Sport and Recreation Assessment. The updated evidence will inform the identification of needs going</p>

Issue Number	Issues raised through consultation	Officer Response
	Consideration should be given to identifying suitable sites in the Plan for meeting outdoor sports needs in consultation with relevant stakeholders.	<p>forward and the level and location of provision in Buntingford.</p> <p>Notwithstanding this, new development proposals will be expected to provide adequate and appropriately located open space, sport and recreation facilities, either on-site or through a financial contribution towards off-site provision.</p> <p>Financial contributions towards the off-site provision of outdoor sports facilities have been secured through S106 legal agreements prepared alongside recently approved planning applications. In addition, the provision of land for outdoor sports facilities has been secured on land to the west of the site north of Buntingford.</p> <p>The Policies Map will be updated to designate the land provided for outdoor sports facilities under Policy CFLR1.</p>
6.152	There is a complete absence of common land in Buntingford for people to exercise and enjoy the rural land. Development will only exacerbate the situation with footpaths being directed through housing estates.	<p>No amendment to Plan in response to this issue</p> <p>New development proposals will be expected to provide adequate and appropriately located open space, sport and recreation facilities, either on-site or through a financial contribution towards off-site provision.</p> <p>The provision of a range of on-site open space types has been secured through S106 legal agreements prepared alongside all of the recently approved planning applications. In addition, financial contributions to off-site provision have also been secured.</p> <p>A significant amount of open space provision (6 hectares) has been secured on land to the west of the site north of Buntingford. This includes an extensive area of parkland amenity space. The Policies Map will be updated to designate this open space provision under policy CFLR1.</p>

EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 25 AUGUST 2016

REPORT BY LEADER OF THE COUNCIL

EAST HERTS DRAFT DISTRICT PLAN – SAWBRIDGEWORTH – SETTLEMENT APPRAISAL AND NEW DRAFT CHAPTER 8

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

The purpose of this report is:

- To present to Members a Settlement Appraisal for Sawbridgeworth, together with a draft revised chapter, for subsequent incorporation into the final draft District Plan.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:	
(A)	the Sawbridgeworth Settlement Appraisal as detailed at Essential Reference Paper ‘B’ to this report, be agreed; and
(B)	the draft revised Chapter 8 (Sawbridgeworth), as detailed in Essential Reference Paper ‘C’ to this report, be agreed as a basis for inclusion in the final draft District Plan, with the content being finalised when the consolidated plan is presented in September 2016.

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.

1.2 The issues raised through the consultation with regard to the Sawbridgeworth Chapter were considered at the District Planning Executive Panel on the 21st July 2016.

- 1.3 This report presents a Settlement Appraisal for Sawbridgeworth. The Settlement Appraisal provides the Council's justification for the proposed redrafted chapter having regard to the issues raised during the Preferred Options consultation, further technical and delivery assessment and sustainability appraisal.
- 1.4 **Essential Reference Paper 'B'** contains the Settlement Appraisal for Sawbridgeworth and **Essential Reference Paper 'C'** contains the revised draft chapter.
- 2.0 Report
- 2.1 The Preferred Options District Plan presented a draft development strategy for Sawbridgeworth that included two proposed allocations:
- Land to the north of West Road for 100 dwellings; and
 - Land to the south of West Road for 300 dwellings.
- 2.2 The Settlement Appraisal identifies how the proposed strategy for the town has been refined following the Preferred Options consultation. The revised draft chapter proposes a reduced quantum of development to the south of West Road due to Green Belt concerns, a slight increase to the north of West Road in response to proposed densities and a new site to the north of the town:
- Land to the north of West Road – 125 dwellings;
 - Land to the south of West Road – 175 dwellings; and
 - Land to the north of Sawbridgeworth – 200 dwellings.
- 2.4 The policies contained in the draft revised chapter set out what the proposed development in Sawbridgeworth will be expected to deliver. These requirements will form the basis of future planning applications.
- 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:	Priority 1 – Improve the health and wellbeing of our communities Priority 2 – Enhance the quality of people's lives Priority 3 – Enable a flourishing local economy
Consultation:	The Report refers to the Draft District Plan consultation carried out between 27 th February and 22 nd May 2014.
Legal:	None
Financial:	None
Human Resource:	None
Risk Management:	None
Health and wellbeing – issues and impacts:	The Pre-Submission 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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Settlement Appraisal

Sawbridgeworth

1. History

- 1.1 The Supporting Document records the various stages of assessment that were undertaken to inform the Preferred Options District Plan. It therefore provides an essential background to this Settlement Appraisal. In particular, Chapters 4 to 6 of the Supporting Document explained the process of shortlisting or ‘sieving’ options or ‘Areas of Search’.
- 1.2 On the basis of the assessments contained within the Supporting Document, and the rest of the evidence base that was available at that time, the Preferred Options District Plan proposed two sites for allocation: land to the south of West Road (300 dwellings) and land to the north of West Road (100 dwellings). In addition, an element of windfall development was attributed to Sawbridgeworth.

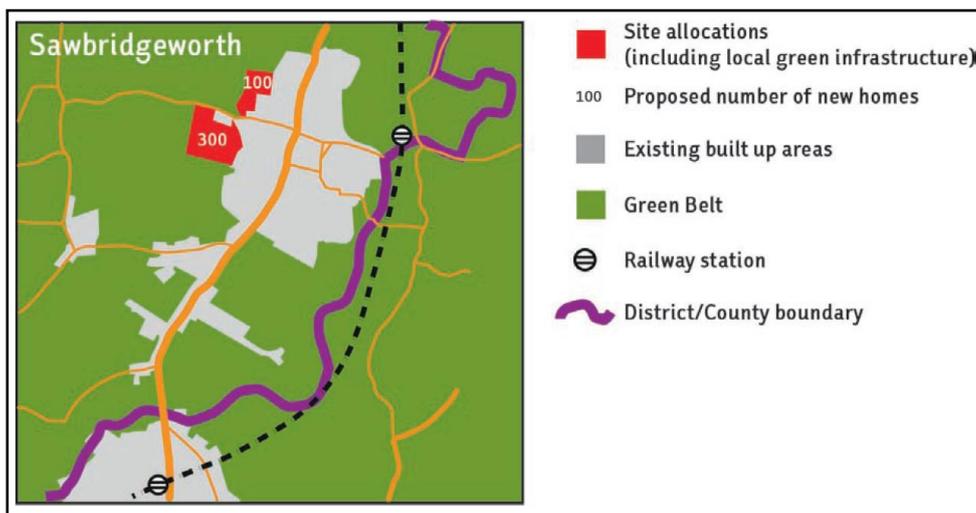


Figure 1: Preferred Options District Plan, Sawbridgeworth Key Diagram

- 1.3 This document continues the narrative of Chapters 4 to 6 by detailing information and evidence which has emerged since the Preferred Options consultation.

2. Consultation Responses – town wide

- 2.1 The Preferred Options consultation elicited a significant response from members of the local community. While these representations covered a variety of topics, the main areas of concern were:

- Education capacity;
- Capacity of health facilities;
- Loss of Green Belt
- Increased congestion on the local road network, and in particular, West Road; and
- Harm to the character of the town.

2.2 In responding to the Preferred Options consultation, Hertfordshire County Council indicated that there are capacity issues with regards to primary education in Sawbridgeworth.

2.3 A full summary of the issues that were raised in respect of Sawbridgeworth and the Officer proposed responses to them were considered by Members at the District Planning Executive Panel meeting on 21st July 2016. These can be viewed via the following link:

<http://democracy.eastherts.gov.uk/documents/s34929/Chapter%208%20Sawbridgeworth%20-%20ERP%20B%20Issue%20Report.pdf>

3 Technical Assessments

Green Belt Review

3.1 The 2015 Green Belt Review assessed a number of parcels within and around Sawbridgeworth. The two parcels to the south and south east of the town (54 and 55) were identified as being of 'very low' suitability for future development. This was largely due to the importance of maintaining the current strategic gap between Sawbridgeworth and the neighbouring settlements of High Wych and Harlow.

3.2 The two large parcels to the west of the town were concluded to be of 'low suitability' for future development. Both parcels prevent encroachment of development on open countryside, while parcel 56 also assists in preventing coalescence between Sawbridgeworth and High Wych.

3.3 Parcel 59, to the north of the town, was regarded as being of 'high' suitability for future development as it does not perform an important function in terms of preventing encroachment into the countryside. Parcel 59a is a small section of Green Belt that extends into the existing urban area of the town, covering Reedings Junior School and the recreation ground to the west. Given the self-contained nature of this parcel of land, it was regarded as being of high suitability for development in Green Belt terms.

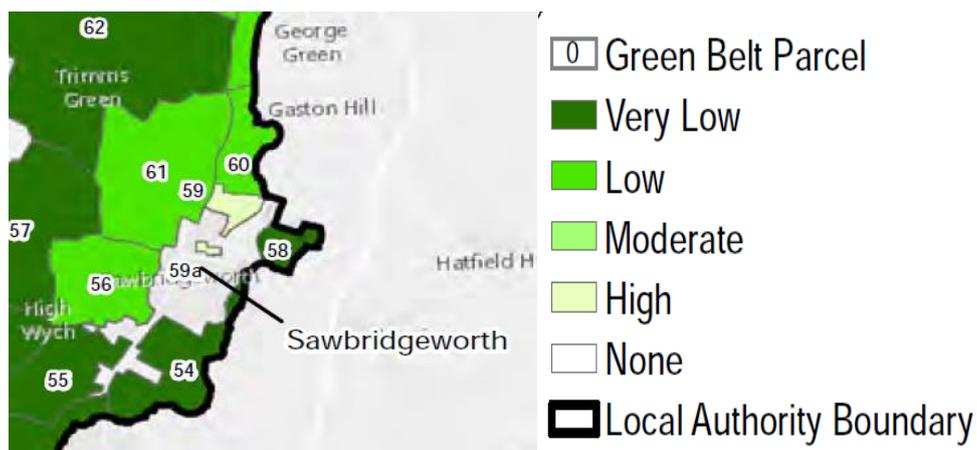


Figure 2: Conclusions of Green Belt Review 2015 for Sawbridgeworth

Transport/Modelling

- 3.4 Prior to the publication of the Preferred Options District Plan, Hertfordshire County Council advised that the provision of more than approximately 500 homes in Sawbridgeworth would require the provision of a bypass of the town. This advice is still extant and therefore continues to provide a clear and significant constraint to further development in the town, above and beyond the approximate figure of 500 dwellings.
- 3.5 Following consultation on the Preferred Options District Plan in 2014, the Council has engaged closely with Essex County Council and our housing market area partners (Harlow, Epping Forest and Uttlesford Councils) in order to undertake strategic transport modelling. This modelling, known as VISUM, identifies that the proposed locations for growth across the wider area would lead to an increase in traffic on the A1184 through Sawbridgeworth. In order to help mitigate this impact, and also alleviate existing pressures and safety concerns, Hertfordshire County Council has suggested a need to upgrade two key junctions:
- Signalisation of the London Road / West Road / Station Road junction
 - Potential signalisation of the A1184 / High Wych Road junction.
- 3.6 The need for these upgrades has also been identified through transport assessment work undertaken by the site promoters for the sites to the north and south of West Road.
- 3.7 While the A1184 will experience greater volumes of traffic throughout the plan period, the strategic VISUM transport model has identified that the provision of a new Junction 7a on the M11 will significantly reduce the impact of wider growth in this location. This is on the basis that car borne

traffic would be more likely to use the M11 to travel between Bishop's Stortford and Harlow, rather than the A1184 as is often the case at present.

Delivery Study

3.8 The Delivery Study is a technical document which assesses the financial viability and deliverability of the proposals contained in the Preferred Options District Plan. While the study did not specifically assess the two proposed sites in Sawbridgeworth, it did test the financial viability of different site typologies. The study concluded that development schemes in the Sawbridgeworth area that are predominantly or wholly residential in nature, should be considered financially viable when taking into account the policy requirements of the District Plan as a whole.

4 Duty to Co-operate

4.1 For those areas such as Sawbridgeworth that are located on the eastern side of the District, the main forum for Duty to Co-operate discussions has been the Co-operation for Sustainable Development Member Board. This group comprises the four core authorities that form the West Essex/East Herts housing market area, along with Hertfordshire and Essex County Councils and other local authorities in the wider area.

4.2 In the context of Sawbridgeworth, there is a clear relationship between the town and Lower Sheering, which is located within Epping Forest District. In particular, pupils who live in Lower Sheering often go to school in Sawbridgeworth. However, at present, Epping Forest District Council are not proposing to direct any significant growth towards Lower Sheering or the surrounding area, and therefore the existing situation is unlikely to be exacerbated.

4.3 Co-operation among the constituent authorities will continue beyond plan adoption in order to address ongoing cross boundary issues.

5 Neighbourhood Planning

5.1 Sawbridgeworth Town Council had an Area Designation approved in December 2015 in order to undertake a Neighbourhood Plan. It is understood that the Plan remains in the early stages of preparation, subject to the finalisation of the District Plan.

6. The Emerging Strategy

6.1 In light of the evidence available, it is considered that three sites should be allocated in Sawbridgeworth:

- Land to the north of West Road – 125 dwellings
- Land to the south of West Road – 175 dwellings
- Land to the north of Sawbridgeworth – 200 dwellings

6.2 The justification for identifying these proposed allocations is presented below.

Policy SAWB2 Land North of West Road, Sawbridgeworth

Introduction

6.3 As noted in paragraph 1.2, land to the north of West Road was identified as a proposed allocation for 100 homes in the Preferred Options District Plan. In light of the evidence available, it is considered that the site should continue to be identified as an allocation within the Pre-Submission version of the Plan. The site is discussed in further detail below.

Identification of Site Constraints

Green Belt

6.4 The site is currently located in the Green Belt. It forms the south eastern section of a much larger parcel of land, Parcel 61, as identified within the Green Belt Review 2015. Overall Parcel 61 was concluded as being of 'low' suitability for development. However, as part of the plan-making process, it is important to review whether smaller areas of Green Belt, within the wider Parcels, could be suitable for release. The findings are discussed in more detail below, based on the four purposes of Green Belt that formed the assessment criteria within the Green Belt Review document. As a result of this assessment, it is considered that the site is suitable for Green Belt release.

Purpose 1: To check the unrestricted sprawl of large built up areas

6.5 The study concluded that Parcel 61 makes a 'Major' contribution to this purpose by restricting the north-west growth of Sawbridgeworth. However, it was also acknowledged that the south eastern section, which forms site SAWB2, makes a 'Moderate' contribution.

Purpose 2: To prevent neighbouring towns from merging into one another

- 6.6 The study concluded that the Parcel makes a 'Moderate' contribution to this purpose given that it extends as far as Spellbrook and therefore forms part of the wider strategic Green Belt gap that prevents the coalescence of Sawbridgeworth and Bishop's Stortford.
- 6.7 However, the SAWB2 site does not extend north beyond the existing urban area and so would only perform a very limited contribution to this purpose.

Purpose 3: To assist in safeguarding the countryside from encroachment

- 6.7 Again the study concluded that the Parcel makes a 'Major' contribution to this purpose as it is characterised by an undulating landscape with wide views in most directions. However the assessment does acknowledge that the south east corner of the Parcel is slightly more contained by the local landform.

Purpose 4: To preserve the setting and special character of historic towns

- 6.8 The study concluded that Parcel 61 makes no contribution to this purpose.

Green Belt Conclusion

- 6.9 While the Green Belt Review concludes that the overall Parcel has low suitability for development, it is considered that the SAWB2 site is well related to the existing urban area, is relatively well contained, and that therefore any harm would be limited.

Other Constraints

- 6.10 There are very few other constraints in relation to the site. A ditch forms the western boundary of the site, however there is no fluvial flood risk associated with it. The risk of surface water flooding would need to be considered at the planning application stage with suitable mitigation provided where required in the form of sustainable drainage. There are no listed buildings or tree preservation orders within the immediate vicinity of the site.
- 6.11 The site is well related to the town centre, and so access to services and facilities is good. The site is also adjacent to Mandeville Primary School and in close proximity to Leventhorpe Secondary School.

Developer Meetings and Information

6.12 No specific meetings have taken place with the developers or site promoters following the Preferred Options consultation. However, In order to assist in its deliberations, the Council invited further information from landowners, developers and agents in the form of Delivery Statements which form the basis of draft Statements of Common Ground. These statements contain details about required infrastructure and utilities and will be used to support the submission of the Plan to the Planning Inspectorate.

Land Uses and Proposals

6.13 Given the size of the site, and in applying a density of around 25 dwellings per hectare, it is considered that it would be suitable to provide approximately 125 dwellings in this location, rather than 100 as initially proposed within the Preferred Options District Plan.

6.14 In addition to residential use, there will be public green space including a play area. Importantly, given that there are capacity issues at primary school level in Sawbridgeworth, development in this location will provide approximately 1.2 hectares of land in order to help facilitate the permanent expansion of Mandeville Primary School to 2FE. The site will also include a parking area that will provide 29 spaces for the school. This will assist in reducing school related congestion on West Road at peak times.



Figure 3: Illustrative conceptual diagram provided by site promoters – not binding on the Council

Infrastructure Needs

6.15 The infrastructure requirements arising from a development of this size are not particularly significant in comparison to much larger sites proposed within the District Plan. However, the main requirements are identified below.

- Financial contributions towards an upgrade to healthcare facilities;
- Provision of affordable housing;
- Provision of land to allow for the permanent expansion of Mandeville Primary School to 2FE;
- Financial contributions towards the expansion of Mandeville Primary School;
- In conjunction with development to the south of West Road (SAWB3), signalisation of the London Road / West Road / Station Road junction will

be required along with possible signalisation of A1184 / High Wych Road junction;

- Utilities works including connection to the main foul sewer;
- Sustainable Drainage Systems (SuDs); and
- Other financial contributions as appropriate.

Implementation

6.16 The site is in the ownership of a single landowner with whom the developer has an option agreement. It is expected that development could start on site in 2018 with a build out rate of approximately 50 homes per year. The site is therefore deliverable in the first five years of the plan period.

Policy SAWB3 Land South of West Road, Sawbridgeworth

Introduction

6.17 As noted in paragraph 1.2, land to the south of West Road was identified as a proposed allocation for 300 homes in the Preferred Options District Plan. In light of the evidence available, it is considered that the site should continue to be identified as an allocation within the Pre-Submission version of the Plan, but for a reduced amount of development. The site is discussed in further detail below.

Identification of Site Constraints

Green Belt

6.18 The site is currently located in the Green Belt. It forms the north eastern section of a much larger parcel of land, Parcel 56, as identified within the Green Belt Review 2015. Overall Parcel 56 was concluded as being of 'low' suitability for development. However, as part of the plan-making process, it is important to review whether smaller areas of Green Belt, within the wider Parcels, could be suitable for release. The findings are discussed in more detail below, based on the four purposes of Green Belt that formed the assessment criteria within the Green Belt Review document. As a result of this assessment, it is considered that the site is suitable for Green Belt release.

Purpose 1: To check the unrestricted sprawl of large built up areas

6.19 The study concluded that Parcel 56 makes a 'Major' contribution to this purpose as development is likely to appear as sprawl in what is considered to

be a broad open landscape. In addition the wider Parcel safeguards the narrow gap between High Wych and the edge of the town on High Wych Road.

- 6.20 The land to the south of West Road, SAWB3, is unlikely to cause harm to the strategic gap between the town and High Wych. However it is recognised that development of the whole site could lead to a perception of sprawl due to the openness of the landscape on the west and south western parts of the site.

Purpose 2: To prevent neighbouring towns from merging into one another

- 6.21 The study concluded that Parcel 61 makes no contribution to this purpose.

Purpose 3: To assist in safeguarding the countryside from encroachment

- 6.22 The study again concluded that the Parcel makes a 'Major' contribution to this purpose. It stated that development in almost any part of this Parcel would likely be an apparent encroachment into countryside, although some eastern and south eastern parts are more contained.

- 6.23 Again, as is the case with Purpose 1 above, it is recognised that development of the whole site could lead to a perception of encroachment due to the openness of the landscape on the west and south western parts of the site.

Purpose 4: To preserve the setting and special character of historic towns

- 6.24 The study concluded that Parcel 56 makes no contribution to this purpose.

Green Belt Conclusion

- 6.25 While the Green Belt Review concludes that the overall Parcel has low suitability for development, it is considered that the SAWB3 site is well related to the existing urban area and that the majority of the site is relatively well contained. However, it is considered that development of west and south western parts of the site would lead to unacceptable harm.

Other Constraints

- 6.26 As is the case with land to the north of West Road, there are very few other constraints in relation to the site. A brook forms the eastern boundary of the site although this does not constrain the developable area. The risk of surface water flooding would need to be considered at the planning application stage with suitable mitigation provided where required in the form of sustainable

drainage. There are no tree preservation orders within the immediate vicinity of the site, and although there are two listed buildings close to the northern boundary, it is unlikely that development would harm their setting to any significant degree.

- 6.27 The site is well related to the town centre, and so access to services and facilities is good. The site is also close to Mandeville Primary School and in relatively close proximity to Leventhorpe Secondary School.

Developer Meetings and Information

- 6.28 Following consideration of the Green Belt Review, a meeting was held with the developers and site promoters. As a result of these discussions, it was agreed that the amount of development proposed for the site should be reduced in order to avoid harm to the more sensitive areas of Green Belt.

- 6.29 The Council subsequently invited further information from landowners, developers and agents in the form of Delivery Statements which form the basis of draft Statements of Common Ground. These statements contain details about required infrastructure and utilities and will be used to support the submission of the Plan to the Planning Inspectorate.

Land Uses and Proposals

- 6.30 As noted above, the level of development proposed for this site has been reduced due to Green Belt concerns. While the Preferred Options District Plan proposed 300 homes in this location, it is considered that this should be reduced to approximately 175 homes. This reduction is illustrated in Figure 4 overleaf. In addition to residential use, there will be public green space including play areas.



Figure 4: Illustrative conceptual diagram provided by site promoters – not binding on the Council

Infrastructure Needs

6.31 The infrastructure requirements arising from a development of this size are not particularly significant in comparison to much larger sites proposed within the District Plan. However, the main requirements are identified below.

- Financial contributions towards an upgrade to healthcare facilities;
- Provision of affordable housing;
- Financial contributions towards the expansion of Mandeville Primary School;
- In conjunction with development to the north of West Road (SAWB2), signalisation of the London Road / West Road / Station Road junction will be required along with possible signalisation of A1184 / High Wych Road junction;

- An extension to the existing footpath on the southern side of West Road in order to serve the development;
- Utilities works including connection to the main foul sewer;
- Sustainable Drainage Systems (SuDs); and
- Other financial contributions as appropriate.

Implementation

6.32 A single developer has an option agreement on the site. It is expected that development could start on site in 2018 with a build out rate of approximately 75 homes per year. The site is therefore deliverable in the first five years of the plan period.

Policy SAWB4 (New Site) Land to the North of Sawbridgeworth

Introduction

6.33 Prior to the Preferred Options consultation, the broad area of land to the north of Sawbridgeworth was assessed as part of the 'sieving' process described in Paragraph 1.1. At that time development in this wider location was not considered favourable, largely due to concerns regarding flood risk and potential impact on sites of environmental importance. However, the significant level of housing need in East Herts has resulted in a need to re-examine previously discarded options. As a result of this work, and new evidence such as the Green Belt Review 2015, it is now considered that land in this location should be allocated for approximately 200 homes.

Identification of Site Constraints

Green Belt

6.34 The site is currently located in the Green Belt. It forms a significant proportion of Parcel 59 as identified within the Green Belt Review 2015. Overall Parcel 59 was concluded as being of 'high' suitability for development, largely because the existing Green Belt boundary in that location is poorly defined and it was considered that there are more appropriate boundaries further north. The assessment does acknowledge that the eastern section of this Parcel is more sensitive, given that it forms the lower slopes of the Stort Valley. Given this assessment, the western part of Parcel 59 is considered suitable for Green Belt release.

Other Constraints

6.35 There are very few other constraints related to this site. As acknowledged in Paragraph 6.33, land in this location was previously dismissed from consideration due to concerns regarding flood risk and potential impact on sites of environmental importance. However, these constraints are related to the eastern section of this wider area. Therefore, in avoiding the more sensitive area of Green Belt, as described in Paragraph 6.34, these other constraints can be avoided or mitigated. The proposed site area is identified in Figure 5 below.

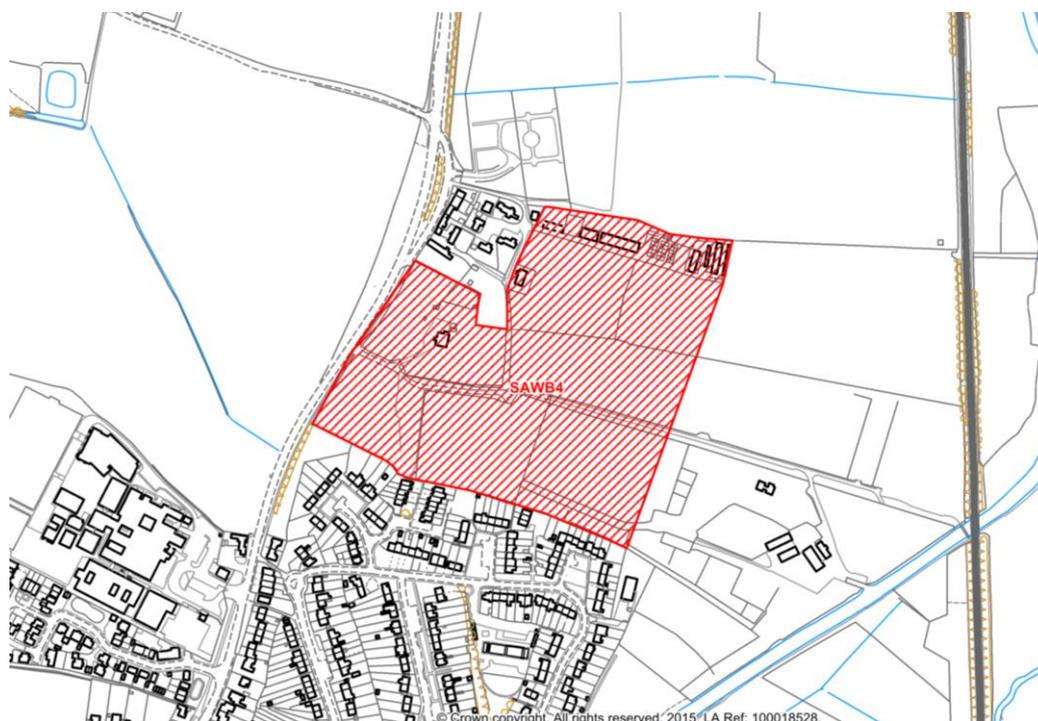


Figure 5: Proposed Allocation Boundary

Developer Meetings and Information

6.36 Meetings have been held with all of the relevant landowners in order to ensure that the land is available for development. However, at present, the site isn't in the control of a developer.

Land Uses and Proposals

6.37 The site will deliver approximately 200 new homes and should incorporate new public green space. The development would need to incorporate suitable

planting on the eastern boundary in order to provide a strong Green Belt boundary in this location.

Infrastructure Needs

6.31 The infrastructure requirements arising from a development of this size are not particularly significant in comparison to much larger sites proposed within the District Plan. However, the main requirements are identified below.

- Financial contributions towards an upgrade to healthcare and education facilities;
- Provision of affordable housing;
- Utilities works including connection to the main foul sewer;
- Sustainable Drainage Systems (SuDs); and
- Other financial contributions as appropriate.

Implementation

6.32 Given that the site is not currently in the control of a developer, it is not expected that housing would be delivered in the first five years of the plan period.

7. Consideration of Alternative Sites

7.1 As part of the Plan-making process it is necessary to consider whether there are alternative options to the proposed development. As identified by Paragraph 1.1, the Supporting Document assessed a number of Areas of Search prior to the Preferred Options consultation. However, a large number of sites were also submitted to the Council through the 'Call for Sites' process. As identified in Paragraph 3.4, the County Council has advised that development above an approximate figure of 500 dwellings would require the provision of a bypass. The three proposed allocations have a combined capacity of 500 dwellings. Therefore, in order for other sites to be allocated, it would need to be demonstrated that they are preferable in sustainability terms than one or more of the three proposed allocations. The suitability of these alternative site options has been assessed through the Strategic Land Availability Assessment (SLAA), and are discussed in more detail below.

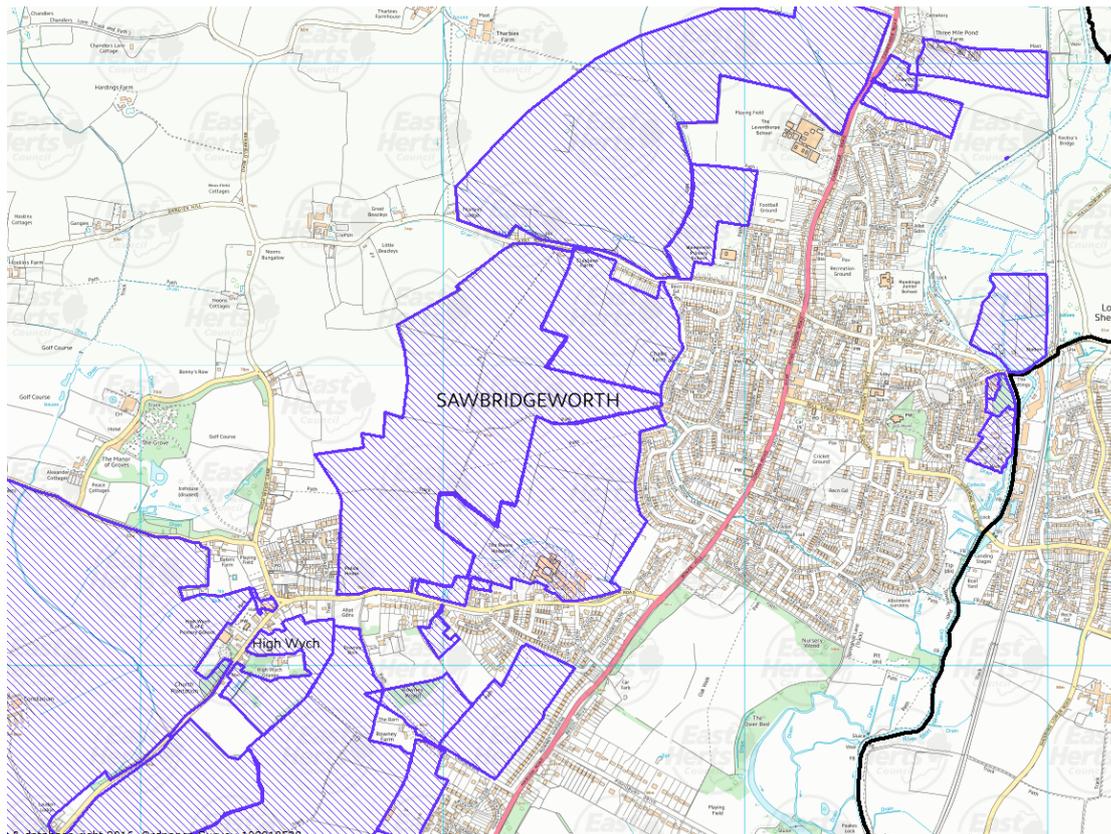


Figure 6: Strategic Land Availability Assessment sites around Sawbridgeworth

Sites to South West of Sawbridgeworth

7.2 A number of sites were submitted to the Council within the broad parcel of land to the south of High Wych Road. While these sites vary in size, they all fall within a strategic parcel of Green Belt that prevents coalescence of Sawbridgeworth with Harlow and High Wych. Development of any of these sites would weaken the distinct and separate character of the three settlements. These sites are therefore considered to be less preferable in Green Belt terms than the three proposed allocations. In addition, SAWB2 and SAWB3 are better related to services and facilities and are therefore considered to be more sustainable.

Sites to the West of Sawbridgeworth

7.3 In addition to SAWB2 and SAWB3, four sites were submitted to the west of the town, north of High Wych Road. Development of the smallest of these sites would reduce the already narrow strategic gap between Sawbridgeworth and High Wych and is therefore not preferable.

7.4 Two very large sites were also proposed for large scale strategic development. This scale of development to the west of the town was dismissed through the sieving process in the Supporting Document, largely

due to the significant negative impact that it would have on the character of the town. At this stage it is also unclear whether the provision of a bypass would be deliverable in the plan period. In addition, development on this scale would lead to coalescence issues with the proposed Gilston Area development.

- 7.5 The final site on the western side of the town encompasses the Thomas Rivers Hospital site. The Supporting Document considered this area as part of the sieving process. It was dismissed due to its location within the strategic parcel of Green Belt that separates Sawbridgeworth from High Wych. However, the site promoters have since submitted a proposal that would only see the eastern portion of this site developed. While this development would still cause some harm to the Green Belt, it is relatively well contained and is well related to the existing urban area. It could therefore be argued that, in Green Belt terms, the difference between this proposal and the SAWB2 and SAWB3 sites is marginal. However, in terms of access to services and facilities, the two proposed allocations are clearly preferable. Meanwhile the SAWB4 site is also clearly preferable in Green Belt terms, as confirmed by the Green Belt Review.

Sites to the East of Sawbridgeworth

- 7.6 Three sites were submitted to the east of the town, south of Station Road. One of these sites, known as Esbies, has previously been in use for some time as an unauthorised Gypsy and Traveller site. While all three sites are located within the Green Belt, this area was not assessed through the Green Belt Review. Nevertheless development of these areas would lead to clear coalescence issues in terms of the relationship of the town with Lower Sheering. Development would also likely have a negative impact on the environmental quality of the river-scape. These areas are therefore considered to be less preferable than the proposed allocations.
- 7.7 A fourth site was submitted to the north of Station Road. This site is largely located within Flood Zone 3 and is therefore not considered to be developable.

8. SA Objectives

- 8.1 The Sustainability Appraisal is an integral part of Plan-making. This Settlement Appraisal forms part of the Sustainability Appraisal process as it considers the impacts arising from development, and a consideration of alternative options. To assist the broader District-Wide Sustainability

Appraisal, each of the urban extension options and the proposed development strategy for each East Herts town has been assessed against the Sustainability Appraisal Framework as updated by the Strategic Housing Market Area Spatial Options Distribution work. The appraisal, below, of proposed development in Sawbridgeworth describes how the sites will meet the objectives as set out in the Sustainability Appraisal Framework.

Air Quality

- 8.2 There is an existing Air Quality Management Area (AQMA) in Sawbridgeworth. While the relatively modest level of development proposed for the town is unlikely to greatly exacerbate this issue, air quality must be monitored and managed in accordance with Policy EQ4 of the District Plan. Consideration of this issue must also take account of more significant developments elsewhere that are likely to lead to additional car movements on the A1184 through the town.

Biodiversity and Green Infrastructure

- 8.3 None of the three proposed allocations would impact on designated sites of environmental importance. While development of greenfield sites does impact on biodiversity, this can be mitigated to some extent through the provision of green spaces and substantial planting to form buffers and new Green Belt boundaries.

Community and Wellbeing

- 8.4 The proposed housing mix and tenure will support all age ranges, including the needs of an ageing population. Land to the north of West Road (SAWB2) will provide land to facilitate the expansion of Mandeville Primary School. All three sites will provide financial contributions towards healthcare and education, among other things.

Economy and Employment

- 8.5 The proposed developments will not directly provide new employment opportunities beyond the construction phase. However, Sawbridgeworth is well located between two higher order settlements where substantial employment opportunities exist. In particular, the new Enterprise Zone in Harlow is easily accessed.

Historic Environment

- 8.6 The proposed allocations would have a minimal impact on the historic environment.

Housing

- 8.7 The proposals will provide for a wide range of house types and mix, including an appropriate quantum and mix of affordable housing and family sized homes.

Land

- 8.8 All three proposed allocations are currently greenfield sites that are in agricultural use. Development will be at appropriate densities that make efficient use of land while respecting the character of existing development. An assessment will need to be made at the planning application stage in order to ascertain whether any material can be extracted to be used during construction.

Landscape

- 8.9 The proposed allocations are all relatively well contained and any significant impact on landscape quality can be mitigated through careful design and the use of landscape buffers and planting.

Low Carbon Development

- 8.10 Town centre services and facilities can easily be accessed by foot or bicycle from proposed development along West Road (SAWB2 and SAWB3). In addition, an existing footpath runs from the SAWB4 site to the town centre. Development that exceeds sustainability standards contained within Building Regulations will be encouraged.

Transport

- 8.11 All three proposed allocations are close to bus routes that either provide access to the town centre or the wider area including Bishop's Stortford and Harlow. Sawbridgeworth also has a train station that provides direct services to London and Cambridge. Development in Sawbridgeworth and the wider area would increase the amount of car borne traffic using the A1184. However this would be mitigated through local junction improvements and, in particular, the provision of a new Junction 7a on the M11.

Water

- 8.12 Methods to minimise water consumption through construction and occupation of the development will be utilised and appropriate connections to water supply and waste water networks are possible. The wider Rye Meads Sewage Treatment Works has capacity with local improvements to connection points required.

9. Conclusion

- 9.1 The Settlement Appraisal for Sawbridgeworth has demonstrated that, having considered the reasonable alternatives, three sites should be proposed for allocation within the District Plan in order to deliver a total quantum of approximately 500 new homes. The Appraisal also identifies that this is the maximum amount of development that can be directed to the town without the provision of a bypass.
- 9.2 All three sites are located within the Green Belt at present. However, a carefully planned review of Green Belt in East Herts is considered justified by the significant level of housing need that exists across the District. In the case of Sawbridgeworth, the three proposed sites are considered to be the most preferable, taking into consideration sustainability and Green Belt criteria.
- 9.3 All three sites will provide a range of housing mix and tenures, including affordable housing. Development will also contribute financially to enhanced education and health services in the town. Land to the north of West Road will provide land to facilitate the expansion of Mandeville Primary School. Meanwhile, improvements to local road junctions will help to mitigate the impact of increased traffic, while the provision of a new Junction 7a on the M11 will reduce the amount of vehicle movements on the A1184.
- 9.4 It is considered that this presents a positive and sustainable strategy for Sawbridgeworth.

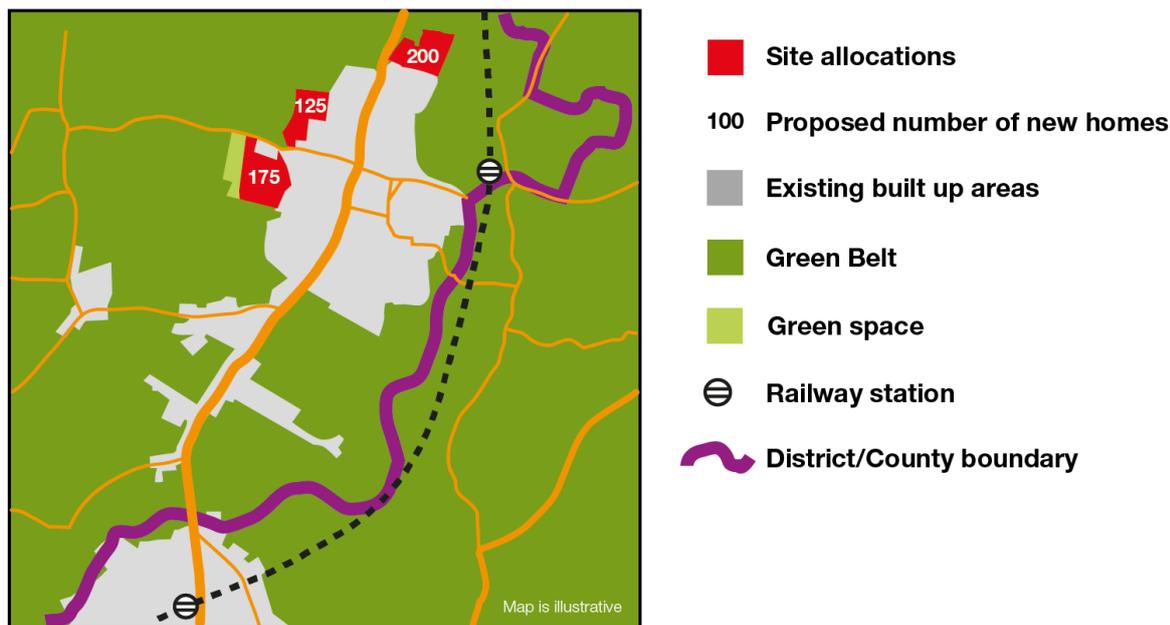
Chapter 8 Sawbridgeworth

8.1 Introduction

- 8.1.1 Sawbridgeworth is an attractive and historic market town lying to the west of the River Stort, which forms part of the County boundary with neighbouring Essex. Although located in close proximity to Bishop's Stortford to the north and Harlow to the south, Sawbridgeworth has a strong and distinct identity. Nevertheless, the town has strong links with these neighbouring settlements, particularly in terms of employment opportunities, with a number of residents also commuting to London and Cambridge using the town's railway link.
- 8.1.2 Residents of Sawbridgeworth benefit from access to high quality public green spaces, particularly Pishiobury Park, a designated parkland which was one of Capability Brown's final projects. The historic commercial core of the town is centred on Bell Street, which lies on an east-west axis running from the 13th Century church of St Mary's to London Road, the old stage-coach route that runs north to south. Much of the town centre lies within a Conservation Area and many of the buildings are listed for their historic significance and date from the Tudor, Stuart and Georgian periods.
- 8.1.3 The medieval core of the town is an attractive location which supports local independent retailers, but it also acts as a constraint to larger retailers. The town has only one small supermarket, meaning that a lot of larger shopping trips are conducted outside the town. Sawbridgeworth is therefore regarded as a Minor Town Centre.
- 8.1.3 Being one of the smaller towns in the District, with a predominance of residential development, there is not much potential for brownfield redevelopment within Sawbridgeworth. Therefore, any large scale residential development would of necessity involve Green Belt release. To meet the need for additional housing in Sawbridgeworth, two sites are proposed for development to the west of the town, and one to the north.

- 8.1.4 The main components of the development strategy for Sawbridgeworth are as follows:
- 8.1.5 **Housing:** additional homes will be provided which will consist of a mix of dwelling types and sizes to ensure that Sawbridgeworth's population is able to access a balanced housing market catering for all life stages. The provision of affordable housing will allow emerging households to remain living in Sawbridgeworth in accommodation suited to their needs.
- 8.1.6 **Education:** the educational needs of the town will be met at primary level via the expansion of Mandeville School to 2 forms of entry. Secondary educational provision will be enhanced by the construction of a new school, in the Bishop's Stortford School Planning Area within which Sawbridgeworth falls.
- 8.1.7 **Transport:** new development will encourage the use of sustainable travel, particularly through the enhancement of walking and cycling links. The impact of development on the local road network will be mitigated through upgrades to existing junctions and the provision of a new Junction 7a on the M11 which will reduce pressure on the A1184.
- 8.1.8 **Economic Development:** Sawbridgeworth's limited employment offer will be maintained to support local scale employment opportunities. As a Minor Town Centre, Sawbridgeworth's retail offer in the central core will be maintained and strengthened if suitable opportunities arise to serve both the town's residents and its local rural hinterland.
- 8.1.9 **Character:** Sawbridgeworth's market town character and the heritage qualities of the town's historic core will be maintained. New development will respect both the local and wider landscape character and will enhance Sawbridgeworth's green infrastructure, through the provision of new public open space.
- 8.2 Development in Sawbridgeworth**
- 8.2.1 The main features of the policy approach to development in Sawbridgeworth are shown on Figure 8.1 below:

Figure 8.1 Key Diagram for Sawbridgeworth



8.2.2 Reflecting the District Plan Strategy, the following policies will apply to applications for new development in Sawbridgeworth:

Policy SAWB1 Development in Sawbridgeworth

In accordance with Policy DPS3 (Housing Supply 2011-2033), Sawbridgeworth will accommodate approximately 500 new homes, which will include:

- (a) 125 homes to the west of the town on land to the north of West Road, as set out in Policy SAWB2 (Land to the North of West Road);
- (b) 175 homes to the west of the town on land to the south of West Road, as set out in Policy SAWB3 (Land to the South of West Road);
- (c) 200 homes to the north of the town, as set out in Policy SAWB4 (Land to the North of Sawbridgeworth); and
- (d) a proportion of the overall windfall allowance for the District.

Development Sites in Sawbridgeworth's Urban Area

8.2.3 It is expected that a proportion of the overall windfall allowance for the District will be accommodated in Sawbridgeworth.

These sites will be determined on an individual basis, taking into account the policies of the Plan.

- 8.2.4 For the allocated sites, the following policies will apply in addition to general policies in the Plan:

Land North of West Road

8.2.5 In order to contribute towards the District's short term housing requirement, and to provide for the housing needs of Sawbridgeworth, development of approximately 125 homes is proposed on land to the north of West Road.

8.2.6 The site provides an opportunity to deliver a range of housing types and tenures in a location that benefits from excellent access to town centre amenities. In addition, the site will provide enhanced walking and cycling links and high quality green space including a new play area.

8.2.7 Development in this location will offer benefits for the wider community by providing 1.2 hectares of land in order to facilitate the permanent expansion of Mandeville Primary School to two forms of entry. The school will also benefit from the provision of new off road parking spaces which will help reduce existing congestion on West Road at peak times.

8.2.8 In order to help mitigate the impact of development in this location, financial contributions towards the signalisation of the A1184/West Road/Station Road junction will be required along with other schemes as required.

Figure 8.2 Site Location: Land North of West Road



Policy SAWB2 Land to the north of West Road

I. Land to the north of West Road is allocated as a residential development site, to accommodate approximately 125 homes by 2022.

II. The development is expected to address the following provisions and issues:

(a) a range of dwelling type and mix, in accordance with the provisions of Policy HOU1 (Type and Mix of Housing);

(b) Affordable Housing in accordance with Policy HOU3 (Affordable Housing);

(c) sustainable transport measures including the encouragement of walking and cycling, in particular to the town centre and railway station, and enhanced passenger transport services;

- (d) an enhanced public footpath and cycleway from West Road to enable direct pedestrian and cycle access to Mandeville School and Leventhorpe School;
- (e) the setting aside of 1.2ha of land to facilitate the expansion of Mandeville School to two forms of entry, including the provision of a new access route;
- (f) off road parking spaces to serve Mandeville School;
- (g) necessary utilities, including integrated communications infrastructure to facilitate home working, and upgrades to the localised sewerage network;
- (h) sustainable drainage and provision for flood mitigation;
- (i) access arrangements and local highways mitigation measures, including junction improvements at the West Road/A1184 junction;
- (j) quality local green infrastructure throughout the site including opportunities for preserving and enhancing on-site assets, maximising opportunities to link into existing assets and enhancing biodiversity;
- (k) new public amenity space;
- (l) landscaping and planting, both within the site and peripheral, to complement development, as appropriate;
- (m) enhanced landscaping along the western boundary of the site to provide a soft edge to the development and define the new Green Belt boundary;
- (n) the delivery of all other necessary on-site and appropriate off-site infrastructure;
- (o) other policy provisions of the District Plan and relevant matters, as appropriate.

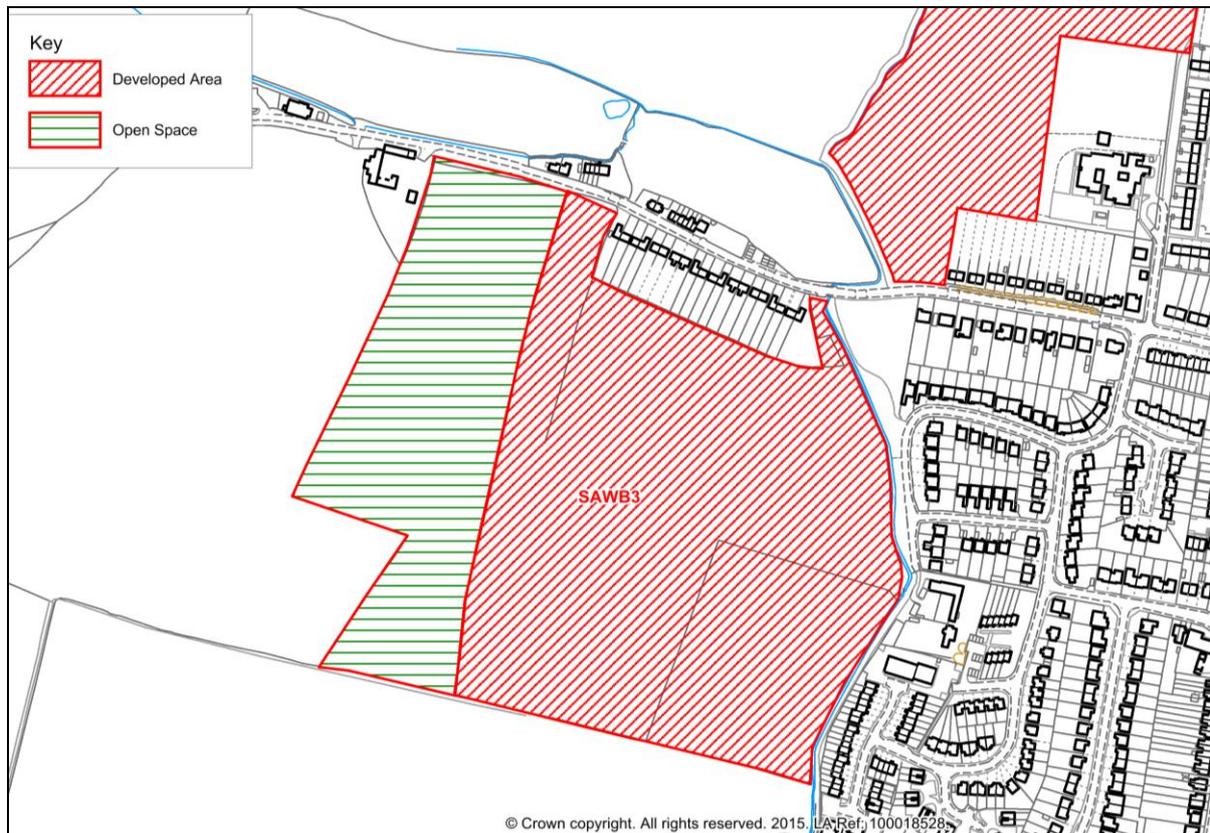
Land South of West Road

- 8.2.9 In order to contribute towards the District's short term housing requirement and to provide for the housing needs of

Sawbridgeworth, development of approximately 175 homes is proposed on land to the south of West Road.

- 8.2.10 As with land to the north of West Road (SAWB2), the site provides an opportunity to deliver a range of housing types and tenures in a location that benefits from excellent access to town centre amenities. A substantial amount of high quality public green space will be delivered, particularly on the western section of the site which will provide a buffer between new development and the countryside beyond.
- 8.2.11 In order to help mitigate the impact of development in this location, financial contributions towards the signalisation of the A1184/West Road/Station Road junction will be required along with other schemes as required.

Figure 8.3 Land South of West Road



Policy SAWB3 Land to the south of West Road

I. Land to the south of West Road is allocated as a residential development site, to accommodate approximately 175 homes by 2022.

II. The development is expected to address the following provisions and issues:

(a) a range of dwelling type and mix, in accordance with the provisions of Policy HOU1 (Type and Mix of Housing);

(b) Affordable Housing in accordance with Policy HOU3 (Affordable Housing);

(c) quality local green infrastructure through the site including opportunities for preserving and enhancing on-site assets (such as Sawbridgeworth Brook), maximising opportunities to link into existing assets and enhance biodiversity;

(d) necessary utilities, including integrated communications infrastructure to facilitate home working, and upgrades to the localised sewerage network;

(e) sustainable drainage and provision for flood mitigation;

(f) access arrangements and local highways mitigation measures, including junction improvements at the West Road/A1184 junction;

(g) sustainable transport measures including the encouragement of walking and cycling, in particular to the town centre and railway station, and enhanced passenger transport services;

(h) the extension of the existing footpath running along the southern side of West Road to serve the new development;

(i) quality local green infrastructure throughout the site including opportunities for preserving and enhancing on-site assets, maximising opportunities to link into existing assets and enhancing biodiversity;

(j) new public amenity space;

(k) landscaping and planting, both within the site and peripheral, to complement development, as appropriate;

(l) provision of an appropriate structural landscape belt and public open space along the western and southern boundaries of the site to provide a soft edge to the development and define the new Green Belt boundary;

(m) the delivery of all other necessary on-site and appropriate off-site infrastructure;

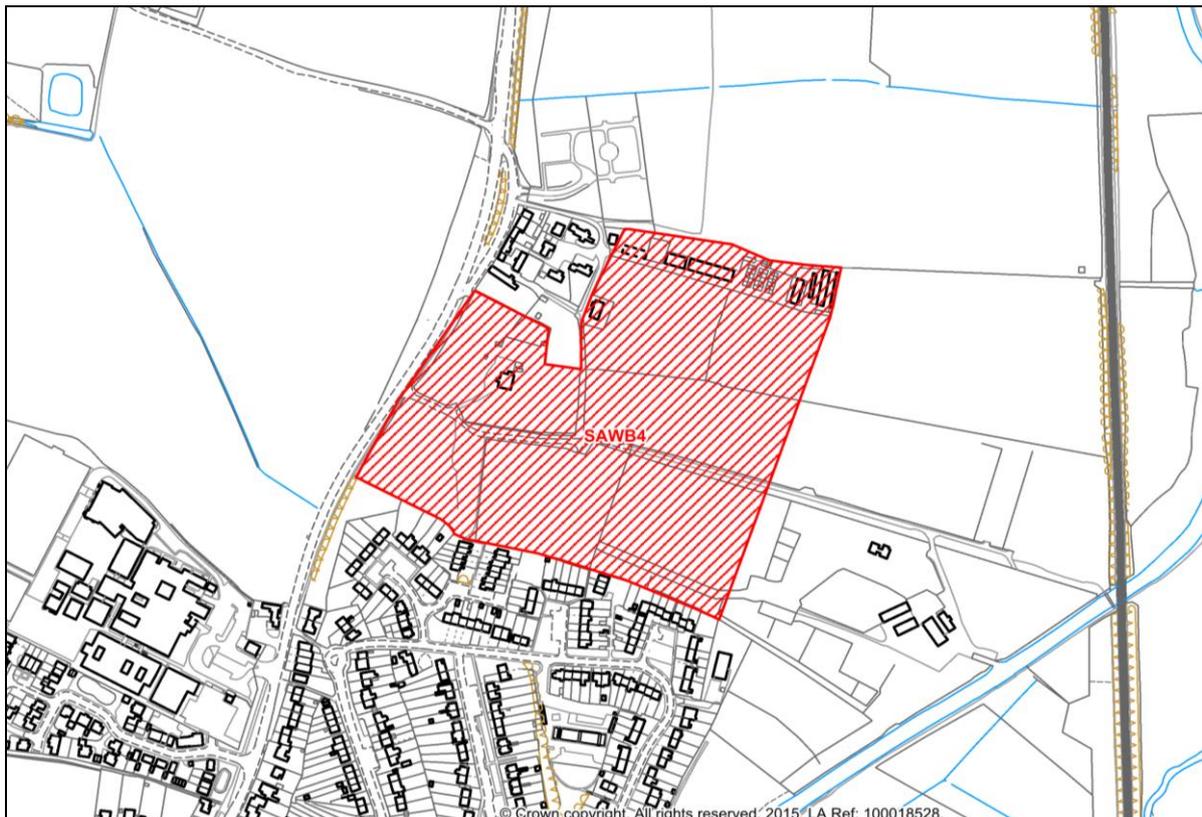
(n) other policy provisions of the District Plan and relevant matters, as appropriate.

Land North of Sawbridgeworth

8.2.9 In order to contribute towards the District's longer term housing requirement and to provide for the housing needs of Sawbridgeworth, development of approximately 200 homes is proposed on land to the north of Sawbridgeworth.

8.2.10 A range of housing mix and tenures and new public green space will be provided in a location that is in close proximity to primary and secondary education and sustainable transport opportunities. In addition, enhanced walking and cycling opportunities will encourage sustainable travel to town centre amenities.

Figure 8.4 Land North of Sawbridgeworth



Policy SAWB4 Land to the north of Sawbridgeworth

I. Land to the north of Sawbridgeworth is allocated as a residential development site, to accommodate approximately 200 homes by 2027.

II. The development is expected to address the following provisions and issues:

(a) a range of dwelling type and mix, in accordance with the provisions of Policy HOU1 (Type and Mix of Housing);

(b) Affordable Housing in accordance with Policy HOU3 (Affordable Housing);

(c) Self Build Housing in accordance with Policy HOU8 (Self Build Housing);

(d) necessary utilities, including integrated communications to facilitate home working, and upgrades to the localised sewerage network;

- (e) sustainable drainage and provision for flood mitigation;
- (f) access arrangements and local highways mitigation measures;
- (g) sustainable transport measures including the encouragement of walking and cycling, in particular to the town centre and railway station, and enhanced passenger transport services;
- (h) quality local green infrastructure throughout the site including opportunities for preserving and enhancing on-site assets, maximising opportunities to link into existing assets and enhancing biodiversity;
- (i) new public amenity space;
- (j) landscaping and planting, both within the site and peripheral, to complement development, as appropriate;
- (k) provision of an appropriate structural landscape belt and public open space along the eastern boundary of the site to provide a soft edge to the development and define the new Green Belt boundary;
- (l) the delivery of all other necessary on-site and appropriate off-site infrastructure;
- (m) other policy provisions of the District Plan and relevant matters, as appropriate.

8.3 Employment in Sawbridgeworth

- 8.3.1 Sawbridgeworth is unique in that it is the only town in the District that doesn't have any designated Employment Areas. This reflects its position between two higher order settlements which are considered to be more attractive employment locations.
- 8.3.2 In order to continue to support the town's local commercial, retailing and service businesses, the strategy will seek to maintain Sawbridgeworth's existing employment offer.

8.4 Retail in Sawbridgeworth

- 8.4.1 Sawbridgeworth has a small town centre, consisting predominantly of small independent units and a modest

supermarket. Despite its size, the town centre provides a vital role for the residents of the town and its immediate rural hinterland.

- 8.4.2 Recognising its size and relatively limited retail offer, the area centred on Bell Street is designated as a Minor Town Centre with only a secondary frontage. Within this frontage, it is necessary to retain a suitable mix of retail units and appropriate town centre uses in order to ensure the longer term vitality and viability of Sawbridgeworth's town centre. As such, retail development in Sawbridgeworth will be considered in accordance with Policies RTC1 (Retail Development) and RTC4 (Secondary Shopping Frontages).

8.5 Leisure and Community Facilities in Sawbridgeworth

- 8.5.1 A site is allocated to the north of Leventhorpe School in order to help address the existing identified shortfall in sports pitch provision in Sawbridgeworth. Development proposals will be considered in accordance with Policy CFLR1 (Open Space, Sport and Recreation).
- 8.5.2 New development in Sawbridgeworth will increase demand for local services and community facilities including healthcare and education. It is important that developments in Sawbridgeworth enhance existing, and provide new community facilities in order to ensure existing and new communities can access vital services without the need to travel to neighbouring settlements. In this respect, development proposals will be considered in accordance with Policies CFLR7 (Community Facilities), CFLR8 (Loss of Community Facilities), CFLR9 (Health and Wellbeing) and CFLR10 (Education).

Policy SAWB5 Sports Pitch Provision

A site of 14 hectares is allocated to the north of Leventhorpe School as shown on the Policies Map for sports pitch provision.

EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 25 AUGUST 2016

REPORT BY LEADER OF THE COUNCIL

EAST HERTS DRAFT DISTRICT PLAN – WARE – SETTLEMENT APPRAISAL AND NEW DRAFT CHAPTER 9

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

The purpose of this report is:

- To present to Members a Settlement Appraisal for Ware, together with a draft revised chapter, for subsequent incorporation into the final draft District Plan.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:	
(A)	the Ware Settlement Appraisal as detailed at Essential Reference Paper 'B' to this report, be agreed; and
(B)	the draft revised Chapter 9 (Ware), as detailed in Essential Reference Paper 'C' to this report, be agreed as a basis for inclusion in the final draft District Plan, with the content being finalised when the consolidated plan is presented in September 2016.

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.

1.2 The issues raised through the consultation with regard to the Ware Chapter were considered at the District Planning Executive Panel on the 21st July 2016.

- 1.3 This report presents a Settlement Appraisal for Ware. The Ware Appraisal provides the Council's justification for the proposed redrafted chapter having regard to the issues raised during the Preferred Options consultation, further technical and delivery assessment and sustainability appraisal.
- 1.4 **Essential Reference Paper 'B'** contains the Settlement Appraisal for Ware and **Essential Reference Paper 'C'** contains the revised draft chapter.
- 2.0 Report
- 2.1 The Preferred Options District Plan presented a draft development strategy for Ware that included one proposed allocation:
- Former Co-op Depot, Star Street for 14 dwellings (Policy WARE2); and
- one proposed Broad Location for Development:
- Land North and East of Ware for strategic scale development of between 200 and 3,000 dwellings (Policy WARE3).
- 2.2 The Settlement Appraisal identifies how the proposed strategy for the town has been refined following the Preferred Options consultation.
- 2.3 Due to the completion of development at the former Co-op Depot, Star Street, the revised chapter has deleted the Preferred Options draft Policy WARE2.
- 2.4 Land to the North and East of Ware was assessed through the Plan-making process and was included in the Preferred Options District Plan as a Broad Location for Development. This meant that the principle of development in this location was reserved subject to further detailed assessments which would have been considered through the production of a Development Plan Document. However, since the Preferred Options consultation, a considerable amount of technical evidence has become available which has enabled the Council to more fully assess the feasibility and suitability of development in this location and this is documented in the Settlement Appraisal.

2.5 Consequently, in the revised draft chapter, Land North and East of Ware is proposed to be allocated for development within the plan period to 2033:

- 1,000 homes to the North and East of Ware

It should further be noted that, should suitable mitigation measures to identified constraints on both the local and wider strategic road networks be identified and agreed by Hertfordshire County Council as Transport Authority, a further 500 dwellings are also expected to be delivered in this location beyond the plan period. To ensure long-term permanence, Green Belt boundaries will be revised on the basis of the provision of the upper figure.

2.6 The policies contained in the draft revised chapter set out what the proposed development in Ware will be expected to deliver. These requirements will form the basis of Masterplanning for the area and inform future planning applications.

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:	Priority 1 – Improve the health and wellbeing of our communities Priority 2 – Enhance the quality of people's lives Priority 3 – Enable a flourishing local economy
Consultation:	The Report refers to the Draft District Plan consultation carried out between 27 th February and 22 nd May 2014.
Legal:	None
Financial:	None
Human Resource:	None
Risk Management:	None
Health and wellbeing – issues and impacts:	The Submission 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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Settlement Appraisal

Ware

1. History

- 1.1 The Preferred Options District Plan proposed development of at least 32 new homes in Ware (which included 14 homes as part of mixed use development at the former Co-op Depot, Star Street within draft Policy WARE2), plus an element of windfall, with additional provision of between 200 and 3,000 homes to the North and East of Ware.



Figure 1: East Herts District Plan, Preferred Options, Ware Key Diagram

- 1.2 The [Supporting Document](#) to the Preferred Options District Plan records the various assessment stages that were undertaken as part of the process to inform the Preferred Options version of the Draft District Plan. It therefore provides an essential background to this current Settlement Appraisal. Chapter 4 of the Supporting Document explains the process of shortlisting or 'sieving' options applied to 'Areas of Search' and their initial findings. Chapter 5 details a further appraisal stage based on option refinement.
- 1.3 Chapter 6 draws together the findings of Chapters 4 and 5 for Ware and provides conclusions to issues considered at previous stages, discussing such matters as educational capacity at primary and secondary level, transport (including trip generation impact and the potential for introducing mitigation measures), other infrastructure such as waste water issues, and the potential deliverability of the development. The chapter then sets out the conclusions for the land to the North and East of Ware in terms of suitability to form part of the emerging District Plan, resulting in the above proposed sites being selected for the Preferred Options stage.

- 1.4 Chapter 6 further established that, for proposed development to the North and East of Ware, it would not be possible to define a specific level of development at that stage, as there was a level of uncertainty around key infrastructure provision and cumulative effects of potential development on the town.
- 1.5 Given the complexities of the site concerning the provision of infrastructure and what the (as-then unknown) effects of traffic impacts of development would be both on the local and wider road network, it was not possible at that time to define a specific level of development that would be appropriate in the location beyond 200 dwellings. However, subject to the results of further testing, there remained the potential for an upper limit of up to 3,000 dwellings to be established in due course.
- 1.6 Therefore, as it was not possible for an upper level to be defined at that point in time and as there was therefore no established site boundary, it was proposed that land to the North and East of Ware be identified as a Broad Location for Development in the Preferred Options District Plan to accommodate a range of between 200 and 3,000 new homes and supporting infrastructure in the Preferred Options consultation.
- 1.7 As a larger level development (if subsequently demonstrated to be acceptable) would need to be comprehensively masterplanned, this was a further consideration which resulted in the proposal that this development would be best accommodated through the preparation of a Development Planning Document (DPD) following the adoption of the District Plan. This Broad Location/DPD approach would set out the Council's intention to deliver development in the overall location within the Plan period commencing between 2021-26, but would enable further work to be undertaken to establish the final quantum of development, define Green Belt boundaries, infrastructure requirements and delivery.
- 1.8 This document now continues the narrative beyond Chapters 4 to 6 of the Supporting Document by detailing information and evidence which has emerged since the Preferred Options consultation.

2. Consultation Response – town-wide

- 2.1 The Preferred Options consultation elicited a significant response from members of the local community. While these representations covered a variety of topics, the main areas of concern were:
- Too much growth in Ware;
 - Development on Green Belt land considered to be inappropriate;

- Highway infrastructure being unable to cope with the level of development proposed;
- Insufficient school places;
- Effect of development in relation to wildlife and conservation interests; and
- Additional development causing harm to the character of the town.

2.2 Several land owners and site promoters made representations specific to their sites and further consideration of these locations is covered at appropriate points throughout the remainder of this document.

3. Green Belt Review

3.1 The 2015 Green Belt Review assessed 12 parcels of land within and around Ware. None of the areas assessed were regarded as being of high suitability for development in Green Belt terms. Only parcel 37a to the West of Ware (adjacent to the Trapstyle area) was adjudged to have Slight/Negligible or Moderate contribution to Green Belt purposes and, as such, was considered to have Moderate suitability for development.

3.2 Parcels 38, 39, 40 (to the north of the town) and 45 and 46 (to the south) were considered to have low suitability for consideration as areas of search for development.

3.3 All other parcels assessed in the Green Belt assessment for Ware (37, 41, 42, 43, 44 and 44a) were, due to their contribution to the purposes of Green Belt, considered to have very low overall suitability as areas of search for development.

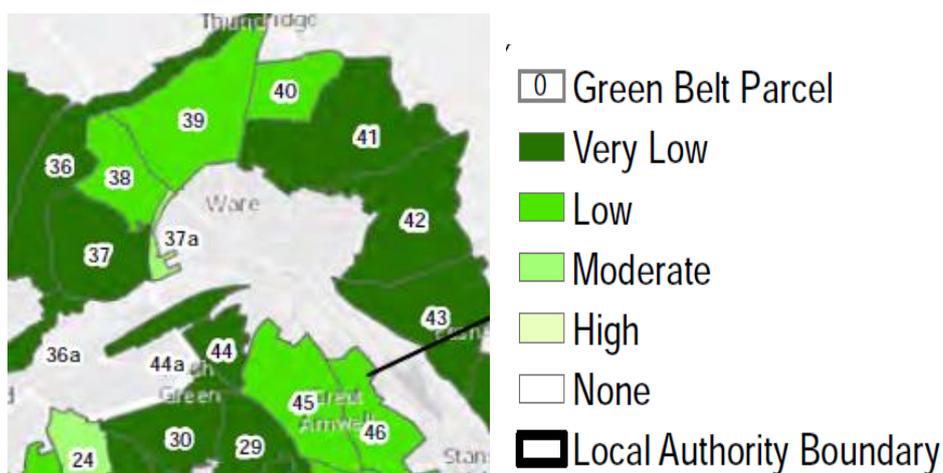


Figure 2: Conclusions of Green Belt Review 2015 for Ware

3.4 While the above map illustrates the overall findings for the whole settlement, for consideration of Land North and East of Ware, the findings of the Study

are covered in greater detail in Policy WARE3: Land North and East of Ware, below.

4. Transport/Modelling

- 4.1 Prior to the publication of the Preferred Options District Plan, Hertfordshire County Council (HCC) had provided transport advice in respect of proposed development in Ware. As there was an extant permission for 14 new homes at the former Co-op Depot, Star Street (draft Policy WARE2), no specific measures were detailed in respect of this particular development.
- 4.2 For the larger area to the North and East of Ware, proposed as a Broad Location for between 200 and 3,000 dwellings, it was recognised that, dependent on the level of development proposed, the impact on the local road network and the town centre (which already suffers considerable congestion at peak times) would be significant and would need to be addressed. It was detailed that a northern spine road may need to be provided to access development to the east. Although development to the north would have good access to the A10, cumulative impact of trip generation on this road would also need to be considered.
- 4.3 Information received from HCC subsequent to the Preferred Options consultation is discussed at the sections covering Policy WARE3: Land North and East of Ware, below.

5. Hertford and Ware Employment Study

- 5.1 The Hertford and Ware Employment Study, June 2016, was undertaken to assess the current strengths and weaknesses of the two towns and establish how they can continue to prosper through the growth of business and employment. Based on an assessment of the quality of existing sites, advice was further provided on the requirement for employment sites in the towns and also on an overall strategy for the provision of floorspace. The work was undertaken in the context of the Council's Economic Development Vision and Action Plan.
- 5.2 The Study established that a high proportion of the working-age residents of the towns are economically active and that the towns have a relatively well qualified workforce. GSK in Ware accounts for a high proportion of overall floorspace. However, it is also noted that the number of jobs available in the towns has decreased by around 600 since 2009. This is contrary to the trend across the district and other benchmark areas and implies that the towns have jointly become a less important employment centre and that out-commuting is likely to have increased. When compared to benchmark

authorities, the Hertford and Ware study area has the lowest office vacancy rate (1.9%), which is largely attributed to changes of use which have occurred.

- 5.3 The report notes that the current provision of employment floorspace in the towns essentially provides for the needs of local businesses and also that the towns are unable to compete for large occupiers with the floorspace in the main transport corridors (M11, A1(M) and M25). Hertford and Ware should, however, be able to compete for medium and small occupiers looking for space in south east Herts.
- 5.4 It is considered important that the Council develop a strategy for dealing with ongoing pressure to release employment sites for residential development and a key element of this involves establishing a clear housing land supply position through progression of the District Plan. Where this does not require the release of employment land, such sites should be protected. In respect of Ware, the best existing employment sites which also have capacity to accommodate further development or offer possibility for employment uses include Marsh Lane and Crane Mead. The report also introduces the potential need to plan for the provision of good quality B1 floorspace in a well accessed strategic location, potentially on the A414 or A10 road corridors.

6. Delivery Study

- 6.1 Due to the small level of development proposed for the Co-op Depot, Star Street within draft Policy WARE2 (14 new homes) and the extant planning permission for development in this location, this area was not considered suitable for assessment via the Delivery Study mechanism.
- 6.2 For the larger proposed broad location, proposals for this area were assessed in the Delivery Study and this is covered in greater detail in Policy WARE3: Land North and East of Ware, below.

7. Duty to Co-operate

- 7.1 Several Duty to Co-operate meetings have been held at Executive Member level, involving officers, between the Council and its adjoining districts. Memoranda of Understanding are being jointly prepared to assist each council moving forward to examination. Records of meetings are published on the Council's website. No major issues in relation to Ware have been cited as specific areas of concern to any neighbouring district, other than the general effects of congestion on the A414 and, in respect of Broxbourne, the potential effects of trip generation related to development to the North and

East of Ware (depending on the final quantum proposed), in respect of impact on the A10 and M25 (junction 25).

8. Neighbourhood Planning

- 8.1 While no Neighbourhood Plan designations have yet been agreed for Ware, it is known that Ware Town Council has established a Steering Group and will be working with the relevant adjoining parishes to bring forward a Neighbourhood Plan in due course.

9. Emerging Strategy

- 9.1 Following the consultation, further work has been undertaken on the District Plan and events have occurred, which have led to a reconsideration of some elements of the proposed strategy. In respect of development proposals for Ware, changes of approach are detailed below within the discrete policy areas.

10. Policy WARE2: Former Co-op Depot, Star Street

- 10.1 This site was included in the District Plan Preferred Options Consultation for the proposed delivery of 14 homes as part of a mixed-use development, which had been carried forward from Policy WA6 of the East Herts Local Plan Second Review, April 2007 (non-saved policy).
- 10.2 Since the 2014 Preferred Options consultation, development of 14 homes as part of mixed use development at the former Co-op Depot, Star Street (also referred to in draft Policy WARE2) has been completed.
- 10.3 As a result of the completion of this development, Policy WARE2 becomes redundant and should be deleted from the Draft District Plan in its Regulation 19 iteration.

11. Policy WARE3 (to be renumbered WARE2): Land to the North and East of Ware

- 11.1 As noted above, and having been informed by the sieving process which is narrated via Chapters 4 through 6 of the Supporting Document, at the Preferred Options Consultation stage the draft policy suggested a range of between 200 and 3,000 dwellings in this location.
- 11.2 The Preferred Options approach involved bringing forward a finally agreed level of development through a Broad Location policy, with details of site boundaries to be confirmed through the subsequent preparation of a DPD.

Therefore, as the area would be subject to further testing to establish the final level of development, no site boundaries were identified at that stage.

- 11.3 In January 2016, the Council met with a Planning Inspector who advised that the Council needed to provide more certainty over the delivery of its emerging strategy. This was in the context of the approach to Broad Locations and the use of Development Plan Documents. The Inspector suggested that where the emerging strategy included very large strategic sites which made up a large proportion of the overall housing number, where it was possible, these locations should become allocations in the District Plan.
- 11.4 In the case of land to the North and East of Ware, at the Preferred Options stage there had been significant evidence gaps, which had resulted in a range of between 200 and 3,000 dwellings being included in the Broad Location policy. Since that time, technical work has been completed (summarised in subsequent sections) and this enables the Council to have greater certainty over the level of development which could be supported in this location across the plan period to 2033. Officers therefore now consider that there is sufficient evidence in place to support an approach which would allow the site to come forward as an allocation in the Plan.

12. Consultation Responses- Policy WARE3: Land North and East of Ware

- 12.1 A significant level of comments were received in respect of draft Policy WARE3 at the 2014 Preferred Options Consultation stage.
- 12.2 The main issues raised related to (in no particular order):
- i) Greater clarity needed on the amount of growth proposed;
 - ii) The development would be more appropriate as a new settlement and should be provided elsewhere in the district;
 - iii) The upper level of development would have a detrimental impact both on the town and its historic character;
 - iv) Traffic impact and the ability of the road network (locally and wider) to accommodate trip generation;
 - v) Potential increase in air and noise pollution;
 - vi) Green Belt land should not be released for development;
 - vii) The development should provide permanent Green Belt boundaries;
 - viii) Greater provision should be made for walking and cycling;
 - ix) Additional bus services required;
 - x) Rail service inadequate to cope with demands of growth;
 - xi) Need to protect wildlife, historic and conservation interests;
 - xii) Development should be self-contained;
 - xiii) Development too far away from the town to integrate with it;
 - xiv) Insufficient health facilities currently to cope with growth;

- xv) Insufficient educational provision;
- xvi) Site promoters favouring particular parcels of land for inclusion in the development/suggested timing of development;
- xvii) Criticism of DPD approach as this would lead to uncertainty and risk delaying delivery, therefore, site allocation preferred;
- xviii) Need to provide additional leisure, indoor and outdoor sports facilities;
- xix) More detail required on type and tenure of housing proposed;
- xx) Need for additional retail facilities;
- xxi) Additional retail facilities could put strain on town centre shops; and
- xxii) Need to avoid sterilising potential minerals deposits.

A full summary of the issues that were raised in respect of draft Policy WARE3 and the Officer proposed responses to them were considered by Members at the District Planning Executive Panel meeting on 21st July 2016. These can be viewed via the following link: <http://democracy.eastherts.gov.uk/ieListDocuments.aspx?CId=151&MId=2951&Ver=4>

13. Technical Assessments

- 13.1 The following sections summarise the various technical evidence based assessments that have been undertaken since the Preferred Options consultation to assess this site alongside the wider Plan preparation process.

East Herts Green Belt Review 2015 (Peter Brett Associates)

- 13.2 As detailed above at Section 3 above, the 2015 Green Belt Review assessed 12 parcels within and around Ware. In respect of draft policy WARE3, four parcels of land fall within this overall area (parcels 39 to 43).
- 13.3 Of these, Parcels 39 and 40 were considered to have low suitability and Parcels 41 and 42 considered to have very low overall suitability as areas of search for development. The full assessment of each area can be found at pages 68 to 74 of the Green Belt Review, which can be viewed via the following link: <http://www.eastherts.gov.uk/greenbeltreview2015>, but a synopsis of each applicable parcel follows.

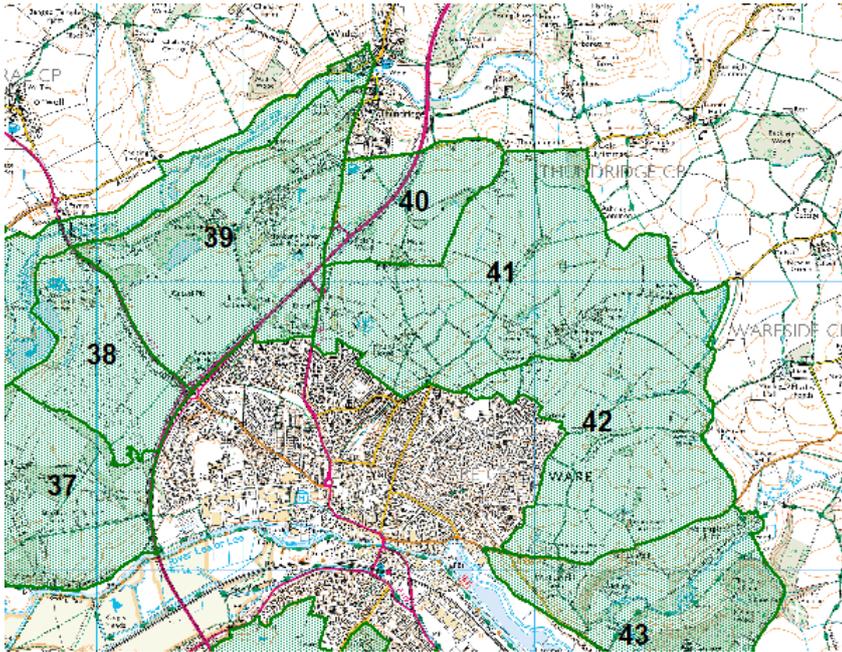


Figure 3: East Herts Green Belt Review Parcels identified by PBA for land to the North and East of Ware

- 13.4 Parcel 39 covers the land to the north of Ware from the A602 to the east to the A1170 Wadesmill Road in the west. The Study considered that the parcel was of 'Major importance in checking the unrestricted sprawl of large built-up areas'; was of 'Slight/Negligible importance in preventing neighbouring towns merging'; was of 'Major (Moderate in south western part) importance in safeguarding the countryside from encroachment'; and made 'No contribution to preserving the setting and special character of historic towns'. The parcel scored Low in terms of its overall suitability as an area of search based on its contribution to the Green Belt purposes.
- 13.5 Parcel 40 covers the land to the north of Ware from the A1170 Wadesmill Road to the east, Moles Farm to the south, Cold Christmas Lane to the north, which is joined by a lane running between the two to the west. The parcel was considered by the Study to be of 'Moderate importance in checking the unrestricted sprawl of large built-up areas'; was of 'No importance in preventing neighbouring towns merging'; was of 'Major importance in safeguarding the countryside from encroachment'; and made 'No contribution to preserving the setting and special character of historic towns'. The parcel scored Low in terms of its overall suitability as an area of search based on its contribution to the Green Belt purposes.
- 13.6 Parcel 41 covers the land to the north east of Ware with its eastern boundary from the A1170 Wadesmill Road to the east (up to the lane leading to Moles Farm); the urban boundary of Ware and Fanhams Hall Lane to the south,

Moles Farm, Cold Christmas Lane and the lane between them to the north, and various field boundaries to the west. The Study concluded that the parcel was of 'Paramount importance in safeguarding the countryside from encroachment'; was of 'No importance in preventing neighbouring towns merging'; was of 'Paramount (Major in contained southern parts) importance in safeguarding the countryside from encroachment'; and made 'No contribution to preserving the setting and special character of historic towns'. The parcel scored Very Low in terms of its overall suitability as an area of search based on its contribution to the Green Belt purposes.

- 13.7 Parcel 42 covers the land to the east of Ware with its eastern boundary from the urban boundary of Ware; Fanhams Hall Lane to the north, various lanes and field boundaries to the west; and the B1004 to the south. The Study concluded that the parcel of 'Paramount importance in safeguarding the countryside from encroachment'; was of 'No importance in preventing neighbouring towns merging'; was of 'Paramount importance in safeguarding the countryside from encroachment'; and made 'No contribution to preserving the setting and special character of historic towns'. The parcel scored Very Low in terms of its overall suitability as an area of search based on its contribution to the Green Belt purposes.

Gypsies and Travellers and Travelling Showpeople

- 13.8 In 2014 the Council commissioned a Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment to identify the needs of Gypsies and Travellers and Travelling Showpeople. The Council further commissioned an Identification of Potential Sites Study in 2014 with the aim of identifying locations where such need could potentially be met.
- 13.9 Subsequent to the publication of revised 'Planning policy for traveller sites' guidance, published by the Government in August 2015, the Council commissioned an update to the Accommodation Needs Assessment, which was finalised in May 2016. The Assessment concluded that five Gypsies and Travellers pitches and nine Travelling Showpeople's plots were needed over the Plan period.

Transport/Modelling

- 13.10 Further to the information received from HCC prior to the Preferred Options consultation (detailed above at Section 4) and its response to the consultation, which confirmed that detailed town based modelling would be required in order to determine detailed impacts of development within Ware, in addition to the need to understand the impacts on the A10 and M25 junction 25; A602; and A414 plus consideration of Air Quality Impacts, and

cost mitigation measures, the site promoters appointed consultants (Transport Planning Associates) to carry out transport modelling. Subsequent survey and other technical work led to the construction of a Paramics transport model to assess the impact of development at various levels. Both the model and its outputs were subject to assessment by HCC in its role as Transport Authority for the area.

- 13.11 Separate to this, and prior to the final reporting of the Ware Paramics model, HCC wrote to East Herts Council in July 2015 following its consideration of studies on the A414 identifying significant concerns regarding the cumulative impact of proposed development in the emerging District Plan on the A414 corridor. This letter set out the position that development beyond the first five years proposed in the draft District Plan (including the development proposed to the North and East of Ware) could not be accommodated by the existing A414 corridor in Hertford.
- 13.12 Further to that, HCC later (26th January 2016) assessed the outcomes of localised Paramics transport modelling for the Ware area undertaken by the consultants appointed by the site promoter for the North and East of Ware proposed Broad Location. In this respect HCC concluded that “although the consultant has proposed some changes to the operating network, the quantum proposed (2,000 to 3,000 units) is not viable, given the additional delays and queues, particularly as assumptions have been made which already reduce the volume of traffic passing through the town centre”. HCC later advised that 300 dwellings would be likely to be acceptable in traffic terms, subject to further testing.
- 13.13 Since that time, refinements to the Ware Paramics modelling have provided HCC with a greater understanding of the likely effects of development in transport terms and potential mitigation measures, not only for the larger 2,000 and 3,000 units previously considered, but also for mid-range levels which were introduced to provide an understanding of the impact of development at 300, 600, 1,000 and 1,500 dwellings.
- 13.14 Following consideration of these refined Paramics outputs, HCC confirmed in a letter dated 19th May 2016 that “recent traffic flow data for the A414 in Hertford indicates that there is capacity to support a mid-range scenario of development [in Ware]...”. This position was then further clarified in a letter dated 17th June which stated that “increasing the size of the proposed development in Ware will therefore use up some of this newly identified spare capacity on the network” and therefore “the best option, at present, is the 1,000 units as this brings the benefit of the link road. However, we would expect that, based on the original quantum being considered, that up to 300 units would be provided within the seven year period (2024, assuming a

2017 start), and any units above this will be provided beyond 2024". This position would relate the delivery of dwellings within the plan period to 2033.

- 13.15 As the Hertfordshire 2050 Transport Vision has yet to be finalised (public consultation is expected shortly) and any resultant mitigation measures to relieve pressure on the A414 through Hertford are yet to be identified, the position beyond 2033 requires clarification. However, the A414 is clearly a major concern for HCC in highway terms and alleviation of the route is therefore likely to form part of the Vision's proposals. Therefore, although there is currently no solution in place for the plan period, it is possible that mitigation measures could be identified to free additional capacity in the corridor at a later date. If such a solution were in place then, in highway terms, a development scenario of 1,500 dwellings would perform best as there would be a greater provision of sustainable transport measures to relieve pressure on routes throughout Ware than in lesser development totals. Development of 2,000 dwellings would have a greater negative impact on the town, leading to considerable delays in queuing over the base scenario.

14. Stakeholder Engagement

- 14.1 A Ware North and East (WARE3) Project Group Meeting was held on 24th April 2014. In addition to East Herts Council Officers, site promoters and agents, the following stakeholders were represented:

Thames Water

Herts County Council: Highways;
Rail/Passenger Transport;
Transport Modelling;
Education (Secondary & Primary Schools);
Property; and
Minerals and Waste.

- 14.2 The main aim of the meeting was to identify the main issues requiring further testing through the District Plan. The following matters were particularly relevant:

Transport

- 14.3 HSGTM strategic model, which had tested the impact of 1,300 dwellings to the east and 1,700 to the north had flagged up areas of concern including the A602 and the A1170/Ware Road, and possibly also the A10 Corridor. However, as the level of modelling was rather coarse, further work would be required via a microsimulation (Paramics) model to understand the impacts

on the local road network including the High Street, and the impacts of mitigation measures, which should also take into account passenger transport initiatives.

Waste Water

- 14.4 The site would need to drain to Rye Meads Sewage Treatment Works, and there was some capacity to accommodate future forecast growth beyond that identified in the Water Cycle Study undertaken in 2008/9 growth due to the downturn in housing development. The predicted capacity limitation dates within the study would therefore effectively move forward with ongoing works to change the way the sewage is treated would provide a further period of relief to between 2021 and 2026. After that time it is likely that additional capacity provision will need to be made. Additional tanks could be provided without any extension of the Treatment Works site and without any encroachment into the adjacent SSSI.
- 14.5 However, importantly, the overall impact and treatment requirement could not be predicted at that time as the cumulative effects of development from all the adjacent local authority areas also served by Rye Meads had not been fully defined.
- 14.6 In terms of connections to the sewerage network, the simplest solution would be for connection to the heads of the pipes, but this would only be feasible for small scale development in the High Oak Road area for development to the North of Ware and also to the East of Ware.
- 14.7 For larger scale development or development in other parts of the North of Ware area, it would be necessary to establish a new connection to the outfall sewer. This would require a new pipe around the northern and eastern edges of the town, with a pumping station to the north to address the slight dip in the valley to the north. While the route could be open to variation and layout would influence what form drainage could take, the end point of the existing sewer in the River Lea locality would be a fixed matter.
- 14.8 The cost of provision could be in the region of around £4-5million. Some funding could become available through OFWAT but, with a single site or consortium, the option of a requisition could also be explored. Under a requisition, Thames Water's contribution would be approximately 12 x the annual income from sewerage charges from the new properties with the developer/s contributing the balance. The planning process for implementation generally takes around five years from initial conception to construction.

Education

- 14.9 Very little capacity exists in the existing primary schools in the area and very little potential to expand the existing schools has been identified, beyond that which was under construction at St Catherine's at the time of the Preferred Options consultation [*Post meeting note: this development has since been completed*].
- 14.10 Strategic scale development would be expected to support itself in educational terms. 500 to 850 dwellings would yield 1 Form of Entry (FE) of 30 pupils, which applies to both Primary and Secondary Schools. A development of 3,000 would equate to six forms of entry (FE) across the development. In respect of secondary schools, there is a range of provision; however, a school must be able to deliver the KS4 curriculum. Minimum effectiveness is recognised as being around 4FE, with HCC preferring the provision of 6-10FE schools.

Wildlife Sites

- 14.11 While unable to attend the meeting, Herts and Middlesex Wildlife Trust (HMWT) communicated that there would be a need to survey the two existing designated wildlife sites during 2015 and that surveying should accord with the HMWT requirements.

Minerals and Waste

- 14.12 East of Ware falls within Minerals Area 8 and HCC would require a detailed study to be carried out by site promoters to assess the potential for minerals extraction and a proposed approach to phasing. This should assess the depth and quality of any underlying mineral deposits to ascertain whether extraction would be economically viable. There may be opportunity to utilise any gravel extracted in the construction process on site.

Healthcare

- 14.13 GP surgeries in the town were at capacity and new capacity would be sought in relation to additional dwellings provided in the area, but also may include the potential to relocate/expand existing facilities in the town. Liaison with the NHS/CCG would be required.

Masterplanning/Delivery

- 14.14 While it was anticipated that detailed masterplanning would be carried out at the DPD stage, it would be necessary for a high-level concept masterplan/s to be produced to inform a spreadsheet of costs. This should factor in all

key aspects of delivery and include important provisions, such as neighbourhood centres, and employment.

- 14.15 In respect of the Infrastructure Delivery Plan, it was important at this stage that an idea of all costs (e.g. GP's, open space etc) was gained in order to inform the process to show that the District Plan would be deliverable.

15. Developer Meetings/Information

- 15.1 Since the Stakeholder Workshop, a number of meetings have been held with site promoters, the majority of which were organised by, and held at, HCC in relation to the development and refining of the Paramics transport modelling. Most of these transport related meetings were also attended by East Herts Council officer/s.
- 15.2 Latterly, meetings at East Herts Council have also been held to discuss other elements of the potential development, including issues relating to Masterplanning, Green Belt, and Education.
- 15.3 It should be noted that, in the period following the Stakeholder event, there have been several changes in land ownership and agent responsibilities for the various parcels of land comprising the overall whole of the area to the North and East of Ware. However, while both attendees and responsibilities have changed over this time, there has been overlap and consistency of approach by those who continue to be involved in the promotion of land in this area.
- 15.4 In order to assist in its deliberations, the Council invited further information from landowners, developers and agents in the form of Delivery Statements which would form the basis of draft Statements of Common Ground. These statements contain details about required infrastructure and utilities and would be used to support the submission of the Plan to the Planning Inspectorate. The preparation of a draft Statement of Common Ground for development to the North and East of Ware will continue to be developed in order that it is finalised as the Council proceeds towards Examination.

16. Deliverability Assessment

Introduction

- 16.1 This Deliverability Assessment section sets out details of the proposed development in relation to its feasibility in delivery terms. It also aims to preempt and address typical queries which could be raised by Inspectors at the Examination stage. It is a useful way of illustrating whether the site would be

deliverable and, if any outstanding issues have been identified that could be an impediment to development, that mitigation measures can be successfully employed to address them. Where it has not yet been possible to fully define such mitigation measures, there should be a clear mechanism in place to ensure that they can be addressed prior to development.

Aims & Objectives

- 16.2 Land to the North and East of Ware is intended to create an urban extension to the town. It should provide a mix of housing type and tenure and further provide a range of supporting facilities and infrastructure. It is viewed as important that the development should be as self-supporting as possible to limit trip generation, while providing the necessary infrastructure to ensure that it integrates well with the fabric, facilities and character of the existing town.
- 16.3 Policy WARE3 set out, at the Preferred Options consultation, a clear framework for the delivery of a sustainable form of development in the location to the North and East of Ware. However, at that stage the scale was undetermined, with a range of between 200 and 3,000 dwellings requiring further testing to ascertain the final amount of development within a Broad Location concept. The Regulation 19 consultation will now identify the final amount of development to be delivered in the overall location via site allocation in the District Plan.

Identification of Site Constraints

Green Belt

- 16.4 The site is currently located within the Green Belt, with the inner Green Belt boundary which is drawn tight against the built-up edge of Ware. The East Herts Green Belt Review 2015 (Peter Brett Associates), discussed above, came to conclusions on the suitability of land in terms of overall suitability as an area of search.
- 16.5 As discussed in the Development Strategy Chapter, the Council has a duty to meet its identified housing need and, due to the lack of brownfield opportunities, this results in a consequential need to release some Green Belt land in order to achieve sustainable development in the district. Officers acknowledge that the assessment of the four land areas to the North and East of Ware would not in itself suggest that the land contained in these parcels would be suitable for Green Belt release. However, it should be noted that Study should be viewed in its overall context, whereby the majority of land assessed throughout the district via this process resulted in

similar ratings being achieved. Therefore, of necessity, the imperative of meeting the district's housing need brings into deliberation locations that may not otherwise have been considered suitable to be brought forward for development.

- 16.6 On balance it is considered that, in order to allow for an urban extension to the sustainable settlement of Ware (which is the third largest settlement in the district), it would be appropriate to allow some Green Belt release in this instance in order to meet identified housing need. In this respect, it will be important to ensure that any future development can be sensitively planned to respect the most important aspects identified in the Green Belt Review in amending the town's boundaries.

Transport

- 16.7 As detailed above, the Paramics modelling undertaken in respect of proposed development to the North and East of Ware has demonstrated significant constraints in relation to both the local and wider road network. At the upper levels of development in the range proposed in the Preferred Options consultation, the view of HCC is that such development would not be acceptable. However, subject to appropriate mitigation, development of 1,000 dwellings would be achievable in the plan period. The provision of a link road to link the north and east of Ware would be required in this respect, and this infrastructure would need to be linked with the provision of sustainable transport measures.

Foul Water Drainage

- 16.8 Development to the North and East of Ware would require a new connection to the outfall sewer via the construction of a new pipe around the northern and eastern edges of the town, with a pumping station to address the slight dip in the valley to the north. This is considered to be deliverable through the development of the site.

Surface Water Flooding

- 16.9 Where evidence of surface water flooding exists this will require mitigation, which can be achieved through the successful masterplanning of the site. There would be the potential to integrate these features into the landscape via incorporation into multi-functional green spaces in place of standard engineered solutions.

Minerals

- 16.10 An element of the easterly part of the site is situated within Minerals Area 8 and HCC, in its capacity as Minerals and Waste Authority, would not support the sterilisation of this asset through built development if the depth and quality of any underlying mineral deposits would result in extraction being economically viable. There may be opportunity to utilise any gravel extracted in the construction process on site.

Heritage Assets

- 16.11 While both lie outside of the area proposed for development, there are two important listed buildings located in close proximity; namely, Poles Park, Hanbury Manor (Grade II*) and Fanhams Hall (Grade II), both also having associated registered Historic Parks and Gardens. It will be essential that any new development respects these key assets, along with other, smaller, listed buildings in the vicinity.

17. Land uses and proposals

- 17.1 The development will comprise a mix of tenures in accordance with Policy HOU1. The new homes will be supported by a range of community facilities, which dependent on the final level of development, will include at least one neighbourhood centre to provide retail and other facilities. Additional to this an employment area (of around 3ha) would be provided to offer opportunities for Ware residents to work locally and thus contain trip generation.
- 17.2 Primary school, with early years, provision will be made on-site corresponding with the level of residential development delivered. Secondary provision, possibly through the delivery of an all-through school, will be made commensurate with the level of development provided. As secondary provision is required to serve a wider area (Ware forms part of the Hertford and Ware school planning area at secondary level) an area of land to accommodate up to six-forms of entry should be set aside, with HCC (as the Local Authority with responsibility for education in Hertfordshire) arranging the delivery of any element of provision beyond that occasioned by the development.
- 17.3 Given the close location of the area to the North of Ware to the Strategic Road Network (A10 in particular) Officers consider that, when combined with lack of available land outside the Green Belt to meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople, this site would provide a suitable location to help meet the identified accommodation needs of Travelling Showpeople (including provision of space for the storage and maintenance of equipment). A site to meet the medium to longer term needs

of Travelling Showpeople would therefore be provided within the overall development area.

- 17.4 In order to mitigate trip generation of all forms of development proposed for the site, a link road between the north (A1170) and east of Ware (Widbury Hill) will be provided. An important aspect of the development will be its connectivity within the site and to the existing town. Walking and cycling and bus connectivity will be prioritised over car users to encourage a shift towards more sustainable means of transport. New bus route provision to enable journeys within the town and to the station. Existing Rights of Way and footways linking to the site will be enhanced, improving access within the site and its relationship to both the urban area and the countryside beyond.
- 17.5 Important heritage assets within and in the vicinity of the site will be protected through adequate mitigation which will include maintaining open or landscaped areas where necessary.
- 17.6 Open spaces will be provided which should provide space for both sports and recreation.
- 17.7 Supplementary to their primary function, open spaces are also likely to include multi-functional drainage solutions, which will be provided in addition to the new foul sewer. Sustainable Urban Drainage will be incorporated into the layout of the development and will create multi-functional green spaces.
- 17.8 The site will incorporate Garden City principles, supported by a masterplan and Supplementary Planning Document which will set out details such as character and design. Masterplanning will ensure involvement of both Town and relevant Parish Councils and meaningful public input to the process will be required.
- 17.9 Areas of woodland and hedgerows will be extended through buffer planting and will contribute to wider ecological networks. Street trees should form an integral part of the design of the site creating, not only pleasant urban greening, but also creating a net gain in terms of biodiversity across the site, which is currently predominantly farmland.

18. Infrastructure Requirements

- 18.1 The key infrastructure requirement to enable development to proceed at a level of 1,000 dwellings or above would be the delivery of a link road between the north of Ware (at the A1170, Wadesmill Road, intersection with the A10) and east of Ware (B1004, Widbury Hill) to provide mitigation for

trips generated by the development and lessen the impact on local roads, especially in the town centre, where the High Street in particular already experiences significant levels of congestion at peak times. Other off-site mitigation measures would also be required.

- 18.2 Development to the North and East of Ware would require a new sewer to be constructed around the northern and eastern edges of the town, together with a pumping station. Thames Water has further confirmed that the Rye Meads Waste Water Treatment Works has the capacity to serve the development.
- 18.3 In respect of education, HCC expects that the development should provide for its latest generated need at both primary and secondary level. In this regard, provision should be made commensurate with the level of development. This would equate to 2 forms of entry for development of 1,000 dwellings, with this rising to 3 forms of entry at 1,500 dwellings.
- 18.4 Primary provision should be made on-site. In respect of secondary provision it is unlikely that there will be sufficient capacity in existing schools in the Hertford and Ware school planning area to accommodate the level/s of growth at the site and, potentially, also elsewhere in the area. Therefore, whilst evidence indicates that a development of 1,000 homes would trigger the need for 2 forms of entry, and 1,500 dwellings generating 3 forms of entry, for a secondary school to function efficiently a minimum of 6 forms of entry would likely be required. Therefore, a site of sufficient size to accommodate 6 forms of entry at secondary level would need to be reserved within the overall developable area, which would be delivered via a phased approach in tandem with the appropriate quanta of development as agreed with HCC, as the Local Authority with responsibility for education in Hertfordshire. The detail of location, access and layout of all educational facilities will be determined through the masterplanning process.
- 18.5 Another important part of any neighbourhood is access to local primary healthcare facilities such as doctors and dentists. This will be particularly necessary given that the site would deliver a range of housing type and tenure, including housing for older and vulnerable people, which have a greater demand for local healthcare services. However, this would not be likely to be fully provided by the development at levels under 1,500 dwellings.
- 18.6 The provision of utilities to serve the proposed development, involving connections and improvements to existing utility infrastructure are considered feasible. The development should further ensure the integration of communications infrastructure into the design of the site to ensure suitable

broadband connectivity for both residents and community and commercial properties.

19. Delivery Study

- 19.1 The East Herts Strategic Sites Delivery Study, September 2015 is a technical document which assessed the financial viability and deliverability of the proposals contained in the Preferred Options District Plan. The Delivery Study assessed development to the North and East of Ware at levels of 2,972 and 2,000 dwellings and appraised viability based on high level cost assumptions.
- 19.2 In respect of the upper level, the Study concluded that “deliverable solutions to critical infrastructure (particularly sewage, utilities, site access and provision of a secondary education [*sic*]) needed to enable the development to take place have been identified and shown to be achievable for the larger scheme”.
- 19.3 For a development of 2,000 dwellings, the Study recognised that “although broadly it looks viable, it may require other developments to contribute to the cost of some of the major infrastructure such as the secondary school and some flexibility on the development density and affordable housing policy”.
- 19.4 Although the Delivery Study did not examine proposals for development at a lower level than 2,000 dwellings, the site promoters have undertaken an assessment using the same parameters as the assumptions used for the Study and have concluded that delivery would be viable, albeit that although key infrastructure provision, such as the new foul sewer, link road and education would be made, lesser levels of delivery would occur in certain respects, commensurate with the quantum of development provided.

Implementation Route Map: Masterplan, Phasing and Delivery

- 19.5 Given the complexities of the site, such as the need to provide the link road, sewer, and coordinate educational provision, amongst other aspects of site delivery, it is proposed that the development should be brought forward through detailed masterplanning.
- 19.6 It is important that all interested parties, including the relevant town and parish councils and the general public are involved in this process to ensure community support for a successful urban extension that would integrate well with the existing settlement. The site promoters have given every indication that they would be willing to follow this route.

- 19.7 Once the Council has launched its Pre-Submission consultation on the District Plan, Officers will progress towards agreeing a Statement of Common Ground with the site promoters/landowners/developers, as applicable, in support of the Examination in Public. This will form the basis of the material to underpin the commencement of preparation of the masterplan for the site.
- 19.8 While the start date of development is subject to the adoption of the Plan, it is currently envisaged that delivery of 300 homes would occur between 2022 and 2027, with a further 700 homes to be constructed between 2027 and 2033. Therefore, there will be a sufficient period of time to ensure that full masterplanning of the site can occur and that all necessary identified infrastructure can be provided at appropriate points in the development process.

20. Duty to Co-operate

- 20.1 No further issues have been raised in respect of this policy area beyond that discussed at paragraph 6.1, above.

21. Neighbourhood Planning

- 21.1 As detailed above at paragraph 7.1, while no Neighbourhood Plan designations have yet been agreed for Ware, it is known that Ware Town Council has established a Neighbourhood Plan Steering Group and will be working with the relevant adjoining parishes to bring forward a Neighbourhood Plan in due course.

22. Consideration of Alternative Sites

- 22.1 As part of the Plan-making process it has been necessary to consider whether any available and suitable alternative options would be better placed to meet the level of development proposed to be delivered in the area to the North and East of Ware. Assuming that land in that location would be suitable in principle for development, it is also necessary to consider whether there would be an alternative location in and around the town of Ware which would have the ability to better accommodate a similar amount of development (i.e. 1,000 to, potentially, 1,500 dwellings in the longer term). The Strategic Land Availability Assessment (SLAA) is considered to be the most appropriate mechanism to establish land which may be available at other locations (either singly or cumulatively) in the immediate Ware area and the forms of development proposed.

22.2 Therefore, the following section considers those sites submitted through the Call for Sites process for residential or mixed uses, which were: large enough to meet the 0.25ha threshold, as identified by national policy; which have not already been granted planning permission (and would therefore count as commitments); or are already included within the proposed allocation area. The sites have been listed below in the order in which they appear in the SLAA, and should not be viewed as being in any order of importance. It should be noted that Members have already taken some of these sites into consideration through agreement of the Officer responses to the Preferred Options consultation at the District Planning Executive Panel held on 21st July 2016.

05/001 – Presdales Pit, Hoe Lane.

22.3 This submission proposes residential, affordable housing and employment development over 11.23ha to the south west of the town. The site is located within the Green Belt and within Area of Search 22, which failed Sieve 1 and was not taken forward to Sieve 2 primarily due to the importance of the location in protecting the strategic gap between Ware and the other neighbouring settlements of Hertford, Great Amwell, Hertford Heath, and Hoddesdon. A similar area of land was submitted in respect of the currently adopted Local Plan and the Inquiry Inspector concluded that “it forms an integral part of the wider area of land serving clear Green Belt purposes. The site assists with checking the sprawl of Ware, safeguarding the countryside from encroachment but its most important function is its strategic role of preventing coalescence of Ware with Hertford, Great Amwell and Stansted Abbots [*sic*]”. It would also “result in an illogical and unacceptable “hole” in the Green Belt, thereby disrupting its strategic functions”. It is not considered that there has been any change in such a position since the 2007 Inspector’s Report and that the stance of defending the Green Belt in this sensitive location should be continued.

05/003 – Nuns' Triangle (land bound by A10/A1170/Quincey Road).

22.4 This submission proposes residential development over 10.65ha in a Green Belt location to the north of Ware and, throughout the sieving process, has been considered under Area 19 (Sub-Area A). In terms of that process, at Sieve 1 the Sub-Area failed in consideration on its own but, in combination with the larger Sub-Area B, it was rated as a Marginal Fail and was thus carried forward to Sieve 2.

22.5 As detailed at the District Planning Executive Panel meeting on 21st July 2016, the detailed technical Transport Paramics work that has been undertaken has identified considerable constraints in the highway network,

which mean that the upper levels of development of 3,000 (or indeed even 2,000) dwellings would no longer be considered appropriate by Officers. Given that the overall area of development is to be significantly reduced, it is important that the most appropriate areas be selected to be taken forward. As the Nun's Triangle performed the worst out of the sub-areas considered through the sieving process (and it is important to note that the Nun's Triangle forms part of a designated Historic Park and Garden), it is now considered that development of the Nun's Triangle would be inappropriate.

- 22.6 As it is Officers' opinion is that the area should not form part of the proposed Site Allocation for the area to the North and East of Ware, it therefore follows that it would not be supported as an alternative location for development.

05/005 – Horticultural Nursery, Presdales School.

- 22.7 This area of 1.12ha is located in the Green Belt to the south west of Ware in the vicinity of Presdales School and is proposed for residential development. The SLAA assessment details that the greenfield site is currently in use as allotments associated with Presdales School.

- 22.8 The site is located within the Green Belt and within Area of Search 22, which failed Sieve 1 and was not taken forward to Sieve 2 primarily due to the importance of the location in protecting the strategic gap between Ware and the other neighbouring settlements of Hertford, Great Amwell, Hertford Heath, and Hoddesdon. While the site would itself be considered to be well related to the existing urban area, it is considered to be unsuitable for development due to its location in the Green Belt and, due to its size, would only have a limited contribution to make.

05/008 – Old Hertfordians Rugby Club, Hoe Lane.

- 22.9 Proposed for residential development, this site of 2.27ha is located in the Green Belt to the south of the town and is positioned directly adjacent to sites 05/017 and 05/019, detailed below.

- 22.10 The site is located within the Green Belt and within Area of Search 22, which failed Sieve 1 and was not taken forward to Sieve 2 primarily due to the importance of the location in protecting the strategic gap between Ware and the other neighbouring settlements of Hertford, Great Amwell, Hertford Heath, and Hoddesdon. While this site was not previously considered by the Inspector to the 2007 Local Plan Inquiry, it is the opinion of Officers that similar arguments apply as to 05/001, above, and that, therefore, development should not be supported in this sensitive Green Belt location,

especially in respect of the coalescence issues between Ware and Hertford that would be of particular concern.

05/013 – Land at Rush Green, Hoe Lane.

22.11 This area of 14.6ha is proposed for residential development and is located to the south west of the town on the opposite side of Hoe Lane to 05/001, above and directly abuts site 05/019, detailed below.

22.12 The site is located within the Green Belt and within Area of Search 22, which failed Sieve 1 and was not taken forward to Sieve 2 primarily due to the importance of the location in protecting the strategic gap between Ware and the other neighbouring settlements of Hertford, Great Amwell, Hertford Heath, and Hoddesdon. While this site was not previously considered by the Inspector to the 2007 Local Plan Inquiry, it is the opinion of Officers that similar arguments apply as in the case of 05/001 and that, therefore, development should not be supported in this sensitive Green Belt location, especially in respect of the coalescence issues between Ware and Hertford that would be of particular concern.

05/014 – Land at Crane Mead.

22.13 This area of land comprises 1.66ha and is proposed for residential development. The Sieve 2 assessment in respect of land to the south east of Ware (Area 21: Sub-Area B) concluded that this area should not be taken forward due to issues concerning flood risk, natural asset and wildlife constraints; effect on the Lee Valley Regional Park and coalescence with the neighbouring settlements of Great Amwell, Stanstead Abbots and Hoddesdon.

22.14 In respect of this specific site, while all sites submitted through the SLAA process will be subject to objective assessment, it should be noted that the majority of it lies within a Wildlife site designation and that, in respect of a previous submission of the site, the Inspector to the 2007 adopted Local Plan stated that the site “To me, it fulfils the function of restricting sprawl of a large built up area, assists in safeguarding the countryside from encroachment and, as part of the river landscape, enhances the setting of the town”. It is therefore the view of Officers that this site should not be supported.

05/017 – Land at Little Acres, Little Acres.

22.15 Residential development is proposed for this area of 2.16ha, which is located to the south of Ware and directly abuts sites 05/008 and 05/019.

22.16 The site is located within the Green Belt and within Area of Search 22, which failed Sieve 1 and was not taken forward to Sieve 2 primarily due to the importance of the location in protecting the strategic gap between Ware and the other neighbouring settlements of Hertford, Great Amwell, Hertford Heath, and Hoddesdon. While this site was not previously considered by the Inspector to the 2007 Local Plan Inquiry, it is the opinion of Officers that similar arguments apply as in the case of 05/001 and that, therefore, development should not be supported in this sensitive Green Belt location, especially in respect of the coalescence issues between Ware and Hertford that would be of particular concern.

05/019 – Hale Club, Hoe Lane

22.17 This site comprises 3.85ha and is located directly adjacent to sites 05/008 and 05/013, above. Residential use is proposed for this area.

22.18 The site is located within the Green Belt and within Area of Search 22, which failed Sieve 1 and was not taken forward to Sieve 2 primarily due to the importance of the location in protecting the strategic gap between Ware and the other neighbouring settlements of Hertford, Great Amwell, Hertford Heath, and Hoddesdon. While this site was not previously considered by the Inspector to the 2007 Local Plan Inquiry, it is the opinion of Officers that similar arguments apply as in the case of 05/001 and that, therefore, development should not be supported in this sensitive Green Belt location, especially in respect of the coalescence issues between Ware and Hertford that would be of particular concern.

05/090 – Land at Trapstyle Woods

22.19 This area of 0.72ha is located within the Green Belt to the west of the town and is proposed for residential use.

22.20 As detailed at District Planning Executive Panel on 21st July, Officers do not consider that the site should be identified as an allocation within the District Plan because, while the site is within the area bounded by the A10, it is within the Green Belt and much of the site is subject to a Tree Preservation Order. Furthermore, while it could be perceived as being well related to existing development, the site provides valuable green infrastructure and acts as an amenity buffer between the A10 and existing residential development. Therefore, the site is not considered to be suitable for development or inclusion in the District Plan.

05/096 – Viaduct Road

22.21 Residential use is proposed for this 1.2ha site to the south of Ware. While well related to existing development, as it directly abuts the urban edge of the town, this greenfield site lies within the Green Belt. The green space is considered by Officers to play an important role in maintaining the semi-rural character of this part of Ware. As such it is considered to be unsuitable for development.

23. SA Objectives

23.1 The Sustainability Appraisal is an integral part of the Plan-making process. This Settlement Appraisal forms part of the Sustainability Appraisal for the District Plan as it considers the impacts arising from development and a consideration of alternative development options. To assist the broader District-Wide Sustainability Appraisal, each of the urban extension options and the proposed development strategy for each East Herts town has been assessed against the Sustainability Appraisal Framework as updated by the Strategic Housing Market Area Spatial Options Distribution work. The appraisal of land to the North and East of Ware, below, describes how the site will meet the objectives as set out in the Sustainability Appraisal Framework.

Air Quality

23.2 The site is not in direct proximity to an Air Quality Management Area (AQMA), but traffic emanating from the development may have some impact on the AQMA declared at Gascoyne Way, Hertford unless or until mitigation measures are introduced. Given this issue, *inter alia*, the phasing of development would be staged in order that delivery would occur towards the end of the plan period. Furthermore, the site will have incorporated Garden City principles which would include tree-lined avenues and buffer planting to minimise and mitigate impacts on areas of woodland. Such increased biodiversity across the site would help mitigate air quality impacts arising from increased vehicle movements and buildings.

Biodiversity and Green Infrastructure

23.3 There are two wildlife sites located within or near to the proposed development:

46/044 Fanhams Hall Meadow

23.4 This location lies outside the defined site area, but in close proximity to it. Fanhams Hall Meadow is noted for supporting diverse species, including

over five neutral grassland indicator species and several calcareous grassland species.

60/001 Wood Lane

- 23.5 The Wood Lane designated Wildlife Site is a habitat of hedge with trees and this lies within the overall development site area. It is described as a green lane with substantial hedge, including one woodland indicator species and 13 woody species in hedge.
- 23.6 Other, non-designated features also exist, both within the site and on the periphery. Therefore, in order to mitigate the impacts of development, the retention, expansion, enhancement and positive management of existing woodland areas, landscape belts and green infrastructure corridors will be required, for both designated and appropriate non-designated wildlife sites in addition to further new provision throughout the site through well designed streets and urban blocks along Garden City principles, as appropriate.

Community and Wellbeing

- 23.7 The proposed housing mix and tenure and range of community facilities will support all age ranges, including the needs of an ageing population. Where any provision of bungalows and assisted living units is made, this should provide for those with specialist physical needs. The neighbourhood centre/s will provide local shops and (subject to the level of development provided) healthcare services, as well as local sources of employment. Early Years, primary and secondary education will also be provided on-site. The use of Garden City principles, along with the provision of formal, informal and accessible natural green space, outdoor and indoor sports and play spaces in the locality will make valuable contributions to health and wellbeing objectives.

Economy and Employment

- 23.8 The site is located on the key north/south A10 corridor leading to the M25 and the A10 also links into the east/west A414 corridor which is a major travel to work corridor through southern Hertfordshire providing links to major towns along key transport networks and access to M11 in the east and A1 and M1 to the west. The site is also closely located to the A602, which provides access to Stevenage and the A1 corridor. The site will provide employment opportunities through the creation of education, retail, community and healthcare facilities on site, and, dependent on level of development, may also provide additional discrete employment development.

Historic Environment

- 23.9 While there are no Areas of Archaeological Significance or listed buildings within the call for sites submission areas themselves for the land to the east of the A1170, there are various key heritage assets in the locality that will need to be respected through careful planning of the development. This would be an important matter for the masterplanning process.

Housing

- 23.10 The development proposals will provide for a wide range of house types and mix of tenures.

Land

- 23.11 There will be a variety of densities across the site ensuring that the land is used efficiently but in a manner that respects the edge of settlement location within a landscaped setting. The land is currently in agricultural use as arable fields. The extraction of sand and gravel may be required to the east of the site, depending on the depth and quality of any deposits in the area. If material is extracted it should be used on-site as construction material.

Landscape

- 23.12 The proposed development area lies entirely within Area 89 of the Landscape Character Assessment Supplementary Planning Document, September 2007. This describes Area 89 as comprising uplands, east of Standon and Braughing, between the Rib and Ash valleys, south to the northern edge of Ware.
- 23.13 The character of the area is noted as being open, gently undulating arable farmland with clustered settlements and few roads, on a clay plateau of varying width between the valleys of the rivers Rib and Ash. This large area is divided into four sub-areas, with the site area to the north and east of Ware being included within the Fanhams Plateau. It is documented that arable cultivation has removed field boundaries and reduced woodland cover and the significant settlements lie within the river valleys, with isolated farms set above them on the edge of the plateau. The whole of Area 89 is distinctive in being the largest uninterrupted plateau in south Hertfordshire and is also noted for having hedgerow oaks within fields rather than in hedge lines.

- 23.14 In terms of land cover and land use, Fanhams plateau has little woodland, with no settlements but some individual houses, isolated farms and small hamlets. In respect of vegetation and wildlife it has important remnant hedgerow/green lane systems, with hazel, dogwood, spindle and ash, and little woodland (except Buckney Wood). There are some pure elm hedges, often unmanaged. Around Fanhams Hall there is a little neutral to calcareous grassland which supports cowslips.
- 23.15 In respect of historic and cultural influences, Fanhams Hall has a listed (Grade II in the Register of Historic Parks and Gardens) early 19th-century authentic Japanese garden and formal English gardens, including a lake, within 11ha of parkland.
- 23.16 The evaluation of the area through the Assessment is in good condition with moderate strength of character and thus results in an overall recommendation that the area should be conserved and strengthened.
- 23.17 This conclusion should therefore be built into landscaping aspects of the future masterplanning of the area.

Low Carbon Development

- 23.18 The site will incorporate footpaths and cycleways and facilitate new bus provision through the site which will connect to the existing town and station, thus facilitating the use of alternative modes of transport. The site will not support a decentralised heating system but will comprise buildings that incorporate sustainable building features exceeding building standards. On-site flood attenuation measures will be a fundamental element of the overall design of the site, incorporating natural drainage features and the creation of suds and swales, as appropriate, in addition to the provision of a new foul sewer.

Transport

- 23.19 The site is well located to provide good connections to the development from the existing urban area and extend the network of pedestrian routes that connect Ware to this area. Cycleways and footpaths will be incorporated into the design in a way which prioritises these routes over the use of private vehicle. Existing bus routes will be supplemented by bespoke services that will run through the development connecting the development to the town centre and its railway station.
- 23.20 Transport modelling indicates that anticipated levels of vehicle movements generated by this development would have an impact on the already

constrained town centre and the provision of a new link road will mitigate some of the effects of motorised vehicle trips generated by the development. Personal transport planning will be key to ensuring that residents are motivated to use sustainable transport modes and thereby lessen the impact of development, which will be limited to 1,000 dwellings in the plan period. Beyond the plan period, should acceptable mitigation to the A414 Gascoyne Way congestion issues be identified, then development of up to 1,500 new homes in total for the area would allow for the provision of enhanced sustainable transport provision to mitigate the effects of development.

Water

23.21 Methods to minimise water consumption through construction and occupation of the development will be utilised and appropriate connections to water supply and waste water networks are possible. The wider Rye Meads Waste Water Treatment Works has capacity with local improvements to connection points required.

24. Conclusion

24.1 The Council has undertaken a thorough appraisal of the potential for development in this location, including the consideration of areas of land in and on the periphery of other parts of the town as either alternative, or supplementary, development options. As discussed in the Development Strategy Chapter, it is considered that the Council's objectively assessed housing need necessitates the release of Green Belt land in order for the Plan to deliver sustainable patterns of development.

24.2 The site to the North and East of Ware, which is positioned on the edge of the district's third largest town, will be well connected to a well-established and historic urban area with many existing shops and services. The development will provide further infrastructure and community facilities that will benefit new and existing residents, such as a new secondary school, potential healthcare provision, and enhanced open spaces and sports facilities. A new foul sewer would also be provided in addition to sustainable drainage measures. The development will also enable connections from the existing urban area to the wider countryside through the improvement and creation of new green infrastructure routes and corridors.

24.3 The site will further provide a new road linking the north and east of the town, which would not only partially alleviate pressure on the already congested town centre, but also ensure that residents and those accessing the town from the east would have an alternative route to access the A10 at the top of the A1170, Wadesmill Road. New homes will be provided in

already established travel to work corridors and will further provide additional new employment opportunities for its residents.

24.4 The masterplan approach will provide opportunities for local engagement in the planning of this new neighbourhood and ensure delivery of development in line with that masterplan's original aims and objectives.

24.5 Given the evolution of available evidence, particularly that which relates to highways, it is now clear that a development of 1,000 dwellings would be the maximum achievable in the plan period; however, sufficient scope should be allowed to enable development of up to 1,500 new homes if suitable mitigation to the A414 issues can be identified. Green Belt boundaries would therefore be redrawn to reflect the overall potential development area and ensure a long-term defensible boundary.

24.6 Therefore, taking into account all the available evidence, it is the considered opinion of Officers that one site should be allocated in Ware:

- Land to the North and East of Ware – 1,000 dwellings within the plan period, with potential to expand to 1,500 beyond 2033, subject to suitable mitigation of the A414 being identified.

24.7 Figure 4 below shows an illustrative conceptual diagram provided by the site promoters, which provides an indication of how the various proposed uses could potentially be configured across the site. This, or a subsequently amended diagram, is likely to be used as a basis for commencing the Masterplanning process which, when finalised, will be used to inform the decision making process. It should be noted that, while the Council will take this diagram into account, decisions on Green Belt boundary revisions will be based on a holistic approach to the settlement overall.

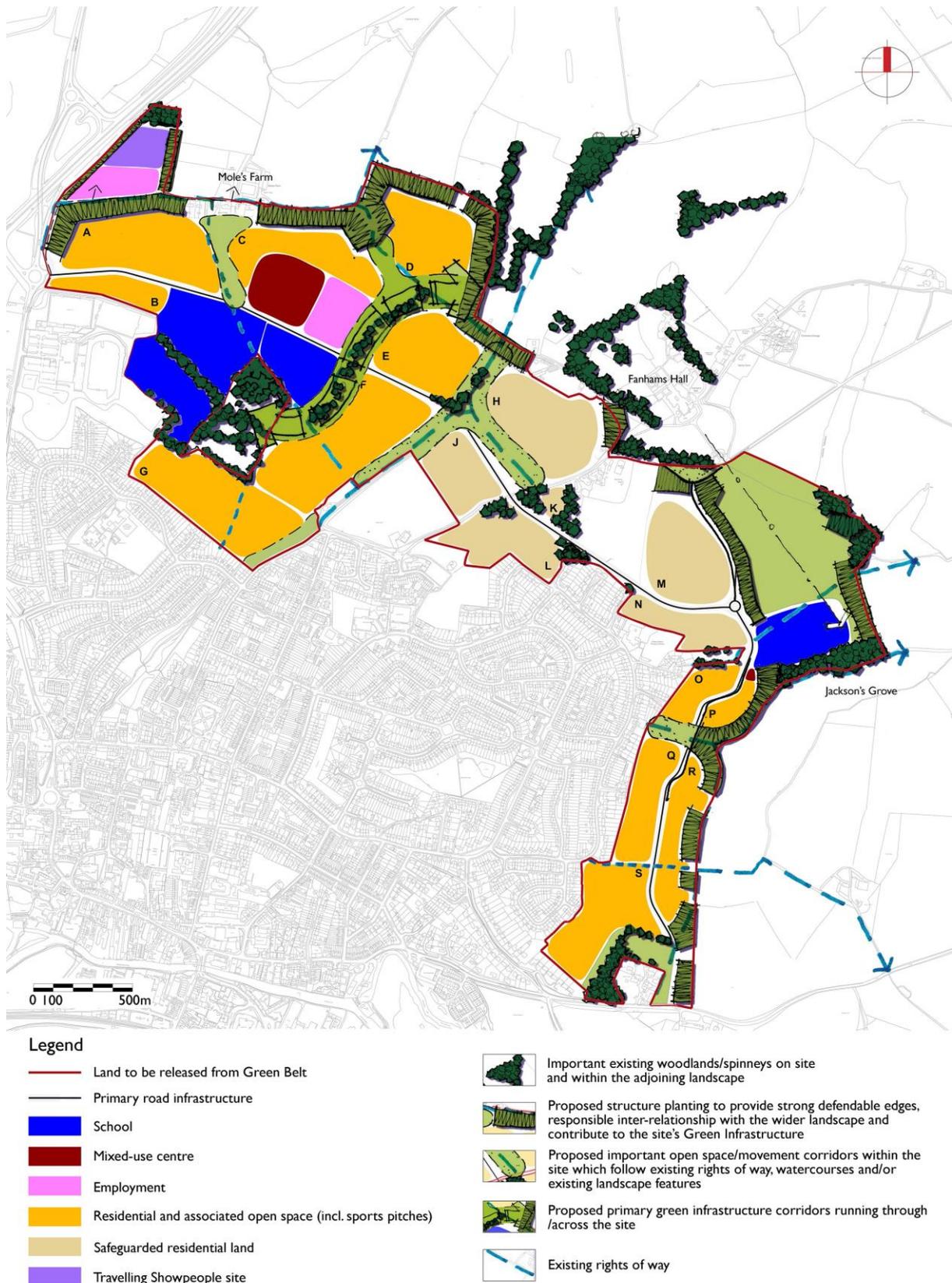


Figure 4: Illustrative conceptual diagram provided by site promoters - not binding on the Council.

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Chapter 9 Ware

9.1 Introduction

- 9.1.1 Ware is an ancient historic market town, which has developed in a valley setting around a crossing point of the River Lea. Much of the town's historic town centre originates from medieval times, with the Grade I listed buildings St Mary's Church (13th Century) and Ware Priory (also a Scheduled Monument) being located at the western end of the High Street, and many other listed buildings in the central core. Past coaching and malting industry ties particularly influenced the evolution of the town's urban form and led to the emergence of its burgage plots and famous 18th Century gazebos along the river.
- 9.1.2 In the past, the river has underpinned the town's economic function, but is now more widely used as a leisure resource. Ware also benefits from other excellent sporting and leisure facilities including, but not limited to: Wodson Park sports centre; Fanshawe Pool and Gym; Ware Lido; Place House; and Fletcher's Lea at The Priory. The Lee Valley Regional Park, which bounds the south of the town, along with other woodland and countryside access opportunities are also available to Ware's residents and visitors.
- 9.1.3 Within the town centre, while the town's historic pattern of development coupled with traffic congestion and servicing constraints on the High Street limit future town centre development opportunities (in particular for retail), it does provide a unique, picturesque, environment which offers enjoyment for both residents and visitors alike and is an attractive setting for its businesses. Ware benefits from the presence of two superstores (Tesco and, since 2015, Asda) and, in addition, also has several smaller convenience stores and a range of comparison high street names and local independent retailers. The central core also reflects its historical past by the presence of a significant amount of

dwellings, which are accommodated both above retail premises and in yards behind.

- 9.1.4 Ware benefits from good transport connections to both local and wider destinations, with road links to the closely located A10, A414 and A602, and a station providing services to London Liverpool Street and Stratford. While these links enable a significant amount of out-commuting for workers, Ware also has a good employment base; most notably, with the district's largest single employer, GSK, being located in the town and through other employment sites of varying age and quality which offer a range of accommodation to businesses. It is considered important that the town's existing employment sites are retained in order to provide local jobs in sustainable locations for residents of Ware and its surrounding areas.
- 9.1.5 In respect of housing, outside of the immediate historic central area, the majority of the town's residential areas were largely erected during or after the Victorian period, with much development occurring towards the latter half of the 20th Century. In latter decades, the construction of new homes on greenfield sites has been balanced by the conversion of former maltings and other redundant industrial premises. While this has been a particularly successful approach, it means that brownfield opportunities have largely been exhausted. Therefore, Green Belt release for any large scale residential development is necessitated.
- 9.1.6 In order to meet the need for additional housing in Ware and to provide a range of employment, retail, educational, community and other infrastructure, one site is therefore proposed to the north and east of the town. This development will ensure that Ware's infrastructure will be able to satisfactorily absorb the additional population and its requirements, whilst ensuring that the town's unique historic character and sense of place is maintained.
- 9.1.7 The main components of the development strategy for Ware are as follows:

- 9.1.8 **Housing:** additional homes will be provided, the majority to the North and East of Ware, which will consist of a mix of dwelling types and sizes that will have been constructed in appropriate locations to ensure that Ware's population is able to access a balanced housing market catering for all life stages. The provision of affordable housing as part of any new residential or mixed use development scheme/s will allow emerging households to be able to remain living in Ware in accommodation suited to their needs. The site will also provide for the accommodation needs of Travelling Showpeople and make provision for self-build and/or custom-build opportunities.
- 9.1.9 **Design:** a collaboratively prepared Masterplan for the development of the North and East of Ware will form an important part of the delivery of the site allocation. This Masterplan, incorporating Garden City design principles, will provide a strong framework for the development, which will also embody the use of design codes. This will ensure the highest quality design and layout of the area and provide a comprehensive and unified approach to the whole development, whilst reflecting different character areas across the site.
- 9.1.10 **Education:** the educational needs of the town will be achieved at primary level via the provision of one or more new schools commensurate with the level of development delivered to the North and East of Ware, and, potentially, by the expansion of existing facilities. Secondary educational provision will be enhanced via the expansion of one or more of the existing schools in the Hertford and Ware Schools Planning Area and via the construction of a new school (which could potentially be an all-through facility) of at least six forms of entry to the North and East of the town. Hertford Regional College will continue to provide further educational opportunities for students from both Ware and wider locales.
- 9.1.11 **Community Facilities:** in addition to the continuation of existing facilities, new homes to the North and East of Ware will

be supported by a range of community facilities which will be located around a neighbourhood centre.

- 9.1.12 **Transport:** as part of development to the North and East of Ware bus services will be improved so that they support travel between residential areas and the town centre and its railway station. Pedestrian and cycle links, routes and facilities will be improved and extended. In addition to supporting improved sustainable travel, a new link road between the A10/A1170 junction and the Widbury Hill area will be constructed to minimise local trips, help relieve the town centre of extraneous traffic, and assist in alleviating congestion.
- 9.1.13 **Waste Water and other Infrastructure:** as part of development to the North and East of Ware, waste water will drain to Rye Meads Waste Water Treatment Works, and new waste water services will be created as part of the development to ensure that the efficiency of the network is maintained and there are no adverse effects on surrounding watercourses. A new sewer will also be required to serve this area of the town and link into the existing network to the east of Ware.
- 9.1.14 **Retail and Employment:** as a Minor Town Centre, Ware's retail offer in the central core will be maintained and strengthened, as suitable opportunities arise, to serve both the town's residents and its hinterland settlements. As part of development to the North and East of the town, the town centre's retail offer will be enhanced by the provision of additional retail facilities within a new neighbourhood centre as part of comprehensive development in that location. Such provision should be appropriate to support the local development without prejudicing the existing retail offer in the town centre.
- 9.1.15 Existing employment sites in Ware will be retained and, where appropriate, modernised. These will be supplemented via the creation of a new employment site of around 3ha as part of development to the North and East of Ware, which should be located close to the new neighbourhood centre.

- 9.1.16 **Leisure:** Ware's leisure facilities will be supplemented by the provision of additional indoor and outdoor sports facilities (which may be shared use) and other informal leisure provision as part of the development of the area to the North and East of Ware. Green corridors will feature as part of this provision, which will also act to mitigate the environmental impact of development in this location.
- 9.1.17 **Open Spaces:** open spaces will be provided as part of the development to the North and East of Ware which provide multi-functional drainage solutions in addition to space for recreation, creating connections to green infrastructure corridors, including the Ash and Lea Valleys. Formal open spaces will form part of the development and provision for playing pitches and play spaces. Areas of ecological importance will be protected and enhanced through appropriate buffer planting and an appropriate land management strategy.
- 9.1.18 **Heritage:** important heritage assets, both within the existing town and in the vicinity of the allocation to the North and East of Ware will continue to be protected. Furthermore, such heritage assets will be respected as part of development proposals and, where appropriate, adequate mitigation employed, which will also include maintaining open or landscaped areas where necessary. Land uses should contribute towards maintaining or enhancing existing buffers, and providing new green infrastructure, as appropriate.
- 9.1.19 **Character:** Ware's unique market town character and the heritage qualities of the town's historic core will be maintained. In new developments a sense of place will be respected and allow for successful integration with existing assets of character in the area. Ware's green infrastructure, including its open spaces and river corridors, will be maintained and will continue to contribute to the town's unique character. Further green space provision will be made as part of development to the North and East of the town. Where development involves river frontages, this will ensure the provision of an enhanced setting and, where possible, improve public access. The Lee Valley

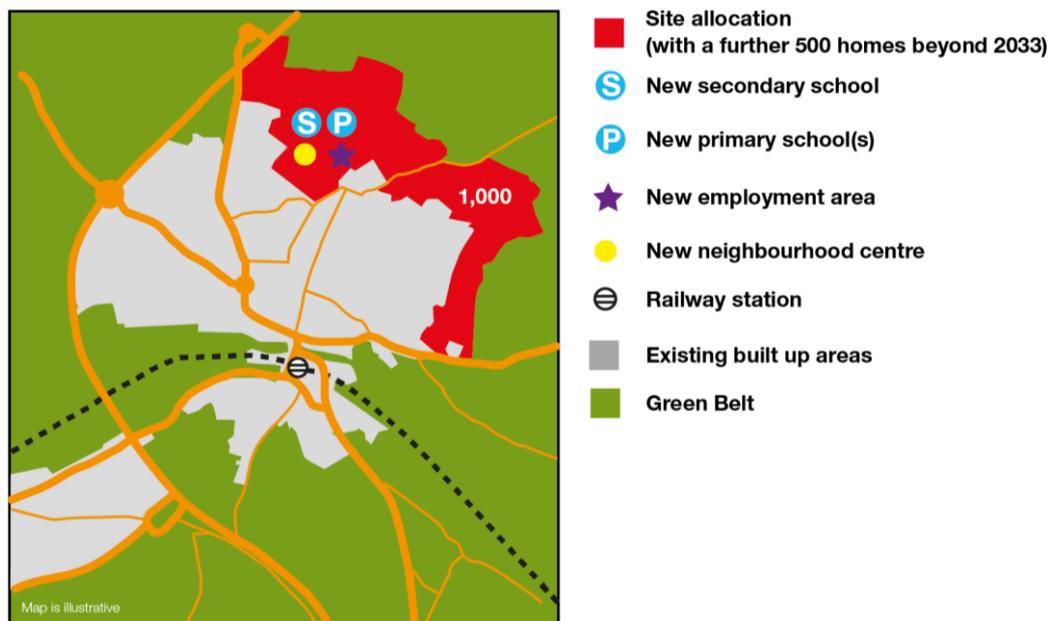
Regional Park will continue to provide a valuable resource to enhance the area.

- 9.1.20 **Minerals:** for development to the North and East of Ware, and to conform with the requirements of national policy and the Hertfordshire Minerals Local Plan which aim to prevent the unnecessary sterilisation of mineral resources, where underlying mineral deposits of sufficient depth and quality are identified, prior extraction will be required in advance of the commencement of development and, where possible, should be used locally in the construction phase. Detailed phasing and the approach to land remediation and subsequent development will be set out in the masterplan.

9.2 Development in Ware

- 9.2.1 The main features of the policy approach to development in Ware are shown in Figure 9.1 below:

Figure 9.1 Key Diagram for Ware



- 9.2.2 Reflecting the District Plan Strategy, the following policies will apply to applications for new development in Ware:

Policy WARE1 Development in Ware

I. In accordance with Policy DPS3 (Housing Supply 2011-2033), Ware will accommodate at least 1,000 homes, which will include:

- (a) 1,000 homes to the North and East of Ware; and
- (b) a proportion of the overall windfall allowance for the District.

Development Sites in Ware's Urban Area

9.2.3 It is expected that a proportion of the overall windfall allowance for the District will be accommodated in Ware. These sites will be determined on an individual basis, taking into account the policies of the Plan.

9.2.4 For the allocated site, the following policies will apply in addition to general policies in the Plan:

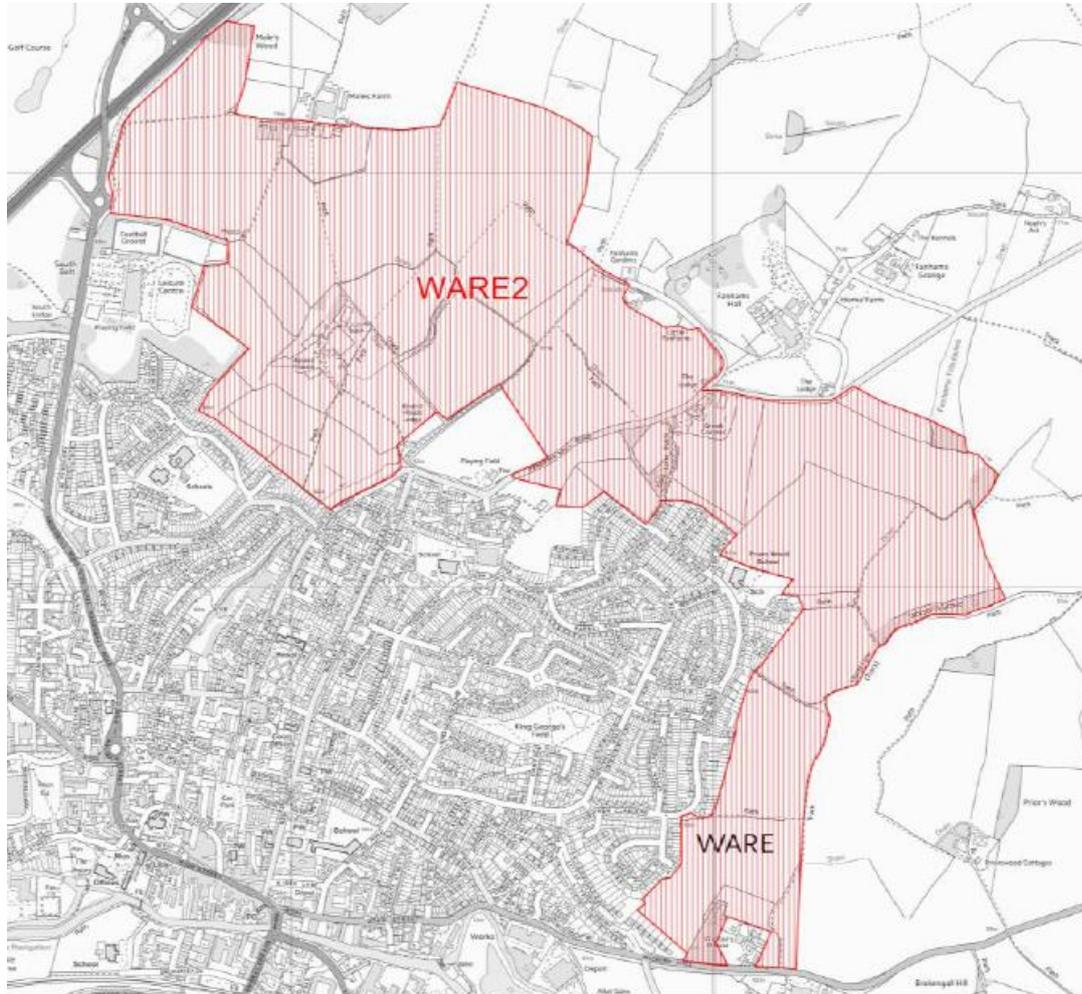
North and East of Ware

9.2.5 In order to contribute towards the District's medium to long-term housing requirement, and to provide for the housing needs of Ware, a development of 1,000 homes is identified to the North and East of Ware to be delivered by 2033, with the intention to provide for a further 500 dwellings beyond this plan period, should satisfactory mitigation to identified highway constraints in both the local, and wider strategic, road networks prove achievable and deliverable.

9.2.6 Development at this scale would require new access and highways infrastructure including the provision of a link road between the A10/A1170 junction and the Widbury Hill area, along with other hard and soft measures, to both mitigate traffic generation and help alleviate town centre congestion issues. The necessary strategic infrastructure would be determined through the evolution of a deliverable site wide Masterplan.

9.2.7 It is anticipated that development could commence on site during 2022-27 period which would continue through the remaining plan period and beyond.

Figure 9.2 Site Location: Land North and East of Ware



Policy WARE2 Land North and East of Ware

I. Land to the North and East of Ware is allocated as a mixed-use development site, to accommodate approximately 1,000 new homes by 2033.

II. In the longer term, and in the event that suitable mitigation measures to identified constraints on both the local and wider strategic road networks can be identified and agreed by Hertfordshire County Council as Transport Authority, a further 500 dwellings will also be delivered in this location.

III. Prior to the submission of any planning application/s a Masterplan setting out the quantum and distribution of land uses; access; sustainable high quality design and layout principles; necessary infrastructure; the relationship between the site and other nearby settlements; landscape and heritage assets; and other relevant matters, will be collaboratively prepared involving site promoters, landowners, East Herts Council, town and parish councils and key stakeholders. This document will further be informed by public participation in the process.

IV. The site will incorporate Garden City principles and be planned comprehensively to create a new sustainable community which connects well with and complements the existing town and its existing historic centre.

V. The development is expected to address the following provisions and issues:

(a) a range of dwelling type and mix, in accordance with the provisions of Policy HOU1 (Type and Mix of Housing);

(b) Affordable Housing in accordance with Policy HOU3 (Affordable Housing);

(c) Self Build Housing in accordance with Policy HOU8 (Self Build Housing);

(d) a care home/flexi-care or sheltered properties in accordance with the provisions of Policy HOU6 (Homes for Older and Vulnerable People);

(e) provision of a site for Travelling Showpeople, in accordance with Policy HOU9 (Gypsies and Travellers and Travelling Showpeople) which should deliver 4 serviced plots within the plan period (each of sufficient size to allow for the provision of accommodation and equipment plus storage/maintenance), to be provided within a larger area that should be safeguarded to allow for future expansion to a total of 8 plots, as evidence of need dictates;

(f) demonstration of the extent of the mineral that may be present and the likelihood of prior extraction in an environmentally acceptable way has been fully considered. As a minimum, an assessment of the depth

and quality of mineral, together with an appraisal of the consequential viability for prior extraction without prejudicing the delivery of housing within the plan period should be provided;

(g) quality local green infrastructure throughout the site including opportunities for preserving and enhancing on-site assets, maximising opportunities to link into existing assets and enhancing biodiversity (including, *inter alia*, the protection of wildlife sites 46/004 and 60/001 and the Historic Parks and Gardens at Fanhams Hall and Poles Park, Hanbury Manor);

(h) necessary new utilities, including, *inter alia*: integrated communications infrastructure to facilitate home working, and a new foul sewer to link the development from the north of Ware to existing infrastructure to the east of the town and any necessary pumping station/s;

(i) satisfactory water supply, including acceptable water pressure for occupants;

(j) sustainable drainage and provision for flood mitigation;

(k) access arrangements and local highways and wider strategic mitigation measures which, *inter alia*, should include a link road between the Widbury Hill area and the A10/A1170 to both serve the development and mitigate congestion elsewhere in the town, and further should contribute to addressing impacts on the A10 between Ware and Hertford and the A414 in Hertford;

(l) encouragement of sustainable transport measures, both through improvements to the existing walking, cycling and bridleway networks in the locality and through new provision, which should also provide links with the adjoining area and the town centre (which should also include a direct public footpath and cycleway from the High Oak Road area to enable direct pedestrian and cycle access to Wodson Park and the A1170), together with enhanced passenger transport services (particularly in respect of bus provision and access to the town centre and railway station);

(m) primary school/s (including early years provision) commensurate with the level of development to serve both the development and appropriate surrounding catchment area/s;

(n) secondary school provision commensurate with the level of development within a site suitable for the provision of at least six forms of entry to serve the development and the wider Hertford and Ware Schools Planning Area;

(o) a neighbourhood centre in an accessible location, providing local retail and community uses, including healthcare facilities to meet the day-to-day retail and health needs of new residents;

(p) employment area/s (of around 3ha), within visible and accessible location/s close to the neighbourhood centre, which provides appropriate opportunities to promote self-containment and sustainability;

(q) indoor and outdoor sports facilities (which may be shared use) to include, *inter alia*, junior football and mini soccer pitches;

(r) a variety of public open spaces across the site, including the provision of play areas and opportunities for outdoor health and fitness activities, as well as space for wildlife;

(s) consideration of need for cemetery provision;

(t) landscaping and planting, both within the site and peripheral, which responds to the existing landscape and complements development, as appropriate;

(u) the delivery of all other necessary on-site and appropriate off-site infrastructure;

(v) other policy provisions of the District Plan and relevant matters, as appropriate.

VI. In order to ensure that the site is planned and delivered comprehensively, any application for development on part of the site will be assessed against its contribution to the Masterplan, and will ensure that such development would not prejudice the implementation of the site allocation as a whole.

9.3 Employment in Ware

9.3.1 The location of Ware in relation to accessing the major road network means that it is an attractive place for businesses to locate. Ware is home to the District's largest private employer, GlaxoSmithKline, and other varying sized enterprises within its employment areas.

9.3.2 In order to continue to provide opportunities for businesses to serve the town and nearby settlements in the surrounding area, the strategy will be to protect and enhance the existing employment areas in Ware.

Policy WARE3 Employment in Ware

I. In accordance with Policy ED1 (Employment), the following locations are designated as Employment Areas:

- (a) Broadmeads;
- (b) Crane Mead;
- (c) Ermine Point/Gentlemen's Field*;
- (d) Marsh Lane;
- (e) Park Road/Harris's Lane;
- (f) Star Street.

II. Development to the North and East of Ware will further deliver a new employment site of around 3ha in conjunction with provision of residential and other uses. The precise location of the new Employment Area will be brought forward through the masterplanning process, as detailed in Policy WARE2.

*N.B. This site lies within the Green Belt outside the main settlement boundaries.

9.4 Retail in Ware

9.4.1 Classed as a Minor Town Centre, Ware caters for a mixture of shopping and other service needs, both for its own residents and those of surrounding settlements. While it has a low

preponderance of national multiple A1 retailers (Tesco, Boots and Peacocks) and therefore lacks the draw that these stores bring (ASDA lies outside of the town centre boundary), Ware is supported by the high quality of its independent stores, weekly market, and also on its higher than average food and drink offer.

9.4.2 Ware also benefits from local parades and individual shops within some of its residential areas, which provide valuable facilities for local people and passing trade in addition to the retail offer in the town centre.

9.4.3 There is considered to be limited opportunity for expanding the retail offer in Ware other than via the provision of local shopping facilities within the proposed development to the North and East of Ware allocation. It is vital that such facilities should be of a local nature with enough provision to ensure a sustainable community, without diverting trade from the town centre, where the retail offer will continue to be safeguarded.

9.5 Leisure and Community Facilities in Ware

9.5.1 Whilst Ware is located within a rural setting, public access to the countryside resource that surrounds the settlement, including the Ash, Lee and Rib Rivers, could be improved, as well as provision of space for children and young people. The provision of additional space for children and young people should be created to support both existing and new communities in the town. Proposals for the development of the WARE2 policy area should assist to some degree in this respect, through increased public access to the countryside and green space provision in the locality.

9.5.2 The improvement of river corridors in terms of both habitat and physical links connecting settlements, especially between Hertford and Ware and the wider countryside will be supported.

9.5.3 In respect of formal indoor and outdoor sport provision, any under provision of junior football and mini-soccer pitches

identified in the Hertford and Ware area should also be addressed. Development proposals will therefore be considered in accordance with Policy CFLR1 (Open Space, Sport and Recreation) and contributions will be sought towards on-site or off-site provision, as appropriate. For development to the North and East of Ware, provision will be considered through the Masterplanning process and could involve shared-use facilities.

9.5.4 The Lee Valley Regional Park penetrates the town providing a valuable leisure resource and any proposals within its boundaries should accord with Policy CFLR5 (The Lee Valley Regional Park).

9.5.5 As any new residential development in Ware will result in an increased demand for local services and community facilities, including, for instance, healthcare and education, development proposals should therefore contribute to the enhancement of existing provision. This will ensure that both new and existing residents in the town are able to access community facilities and vital services within Ware, thereby reducing the need to travel to other settlements. In this respect, development proposals will be considered in accordance with Policies CFLR7 (Community Facilities), CFLR8 (Loss of Community Facilities), CFLR9 (Health and Wellbeing) and CFLR10 (Education).

EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 25 AUGUST 2016

REPORT BY LEADER OF THE COUNCIL

EAST HERTS DRAFT DISTRICT PLAN – EAST OF WELWYN GARDEN CITY – SETTLEMENT APPRAISAL AND NEW DRAFT CHAPTER 13

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

The purpose of this report is:

- To present to Members' a Settlement Appraisal for East of Welwyn Garden City, together with a draft revised chapter, for subsequent incorporation into the final draft District Plan.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:	
(A)	the East of Welwyn Garden City Settlement Appraisal as detailed at Essential Reference Paper 'B' to this report, be agreed; and
(B)	the draft revised Chapter 13 (East of Welwyn Garden City), as detailed in Essential Reference Paper 'C' to this report, be agreed as a basis for inclusion in the final draft District Plan, with the content being finalised when the consolidated plan is presented in September 2016.

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.

1.2 The issues raised through the consultation with regard to the East

of Welwyn Garden City Chapter were considered at the District Planning Executive Panel on the 21st July 2016.

- 1.3 This report presents a Settlement Appraisal for East of Welwyn Garden City. The Settlement Appraisal provides the Council's justification for the proposed redrafted chapter having regard to the issues raised during the Preferred Options consultation, further technical and delivery assessment and sustainability appraisal.
- 1.4 **Essential Reference Paper 'B'** contains the Settlement Appraisal for East of Welwyn Garden City and **Essential Reference Paper 'C'** contains the revised draft chapter.

2.0 Report

- 2.1 Land to the East of Welwyn Garden City was assessed through the Plan-making process and was included in the Preferred Options District Plan as a Broad Location for Development. This meant that the principal of development in this location was reserved subject to further detailed assessments which would be considered through the production of a Development Plan Document. Since the Preferred Options consultation, East Herts and Welwyn Hatfield Council Officers have undertaken technical assessments to assess the feasibility and suitability of development in this location. This is documented in the Settlement Appraisal.
- 2.2 Consequently, land to the East of Welwyn Garden City at Birchall Garden Suburb is allocated for development in both the East Herts District Plan, and the Welwyn Hatfield Local Plan to accommodate 2,550 new homes over the Plan period. 1,350 homes will be in East Herts and 1,200 homes will be in Welwyn Hatfield Borough.
- 2.3 As the development straddles the boundary between the two authorities the site will be planned in a comprehensive and co-ordinated manner. East Herts Council, Welwyn Hatfield Council and Hertfordshire County Council (in its capacity as minerals and waste planning, education and highways authority) will work together with landowners and other key stakeholders to produce a masterplan for Birchall Garden Suburb, which can be adopted as a Supplementary Planning Document to provide a clear basis upon which future planning applications will be considered. The masterplan will set out the detailed phasing of delivery across the

site, but development will commence within the first five years of the Plan period.

2.4 The draft revised chapter sets out what the development will be expected to achieve, a policy that has been jointly prepared and agreed by East Herts, Welwyn Hatfield and County Council Officers, and an illustrative strategy diagram which will be used to inform the masterplanning process and any planning applications.

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:	Priority 1 – Improve the health and wellbeing of our communities Priority 2 – Enhance the quality of people's lives Priority 3 – Enable a flourishing local economy
Consultation:	The Report refers to the Draft District Plan consultation carried out between 27 th February and 22 nd May 2014.
Legal:	None
Financial:	None
Human Resource:	None
Risk Management:	None
Health and wellbeing – issues and impacts:	The 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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Settlement Appraisal

East of Welwyn Garden City

1. History

- 1.1 The [Supporting Document](#) to the Preferred Options District Plan records the various assessment stages that were undertaken to inform the Preferred Options Draft of the District Plan. It therefore provides an essential background to this current Settlement Appraisal. Chapter 4 of the Supporting Document explains the process of shortlisting or 'sieving' options or 'Areas of Search'. Chapter 5 considers two further appraisal stages based on urban form and economic development.
- 1.2 Chapter 6 considered issues such as the Duty-to-Co-operate, whether there are any designated wildlife assets in the area, education capacity at primary and secondary level and the deliverability of the site as a potential development. The chapter also discussed matters of mineral resource, the need to avoid sterilisation and the potential impact this would have on the deliverability of the site and its potential future phasing within the overall development strategy. The chapter then set out the conclusions for the land to the East of Welwyn Garden City in terms of whether it would form part of the emerging District Plan.
- 1.3 It was determined that given the complexities of the site's cross-boundary nature, the likely need for mineral extraction and subsequent land remediation, the site would need to be comprehensively masterplanned. This detailed masterplanning would be best dealt with through the preparation of a Development Plan Document (DPD) following the adoption of the District Plan. The DPD approach would set out the Council's intention to deliver development at the location during the latter part of the Plan period, but would enable further work to be undertaken to define Green Belt boundaries, infrastructure requirements and delivery, and to enable a more collaborative approach to cross-boundary working.
- 1.4 As such, land East of Welwyn Garden City was identified as a Broad Location for Development in the Preferred Options District Plan to accommodate around 1,700 new homes and supporting infrastructure. Given the need for prior mineral extraction, it was estimated that only 450 homes would be completed by 2031.

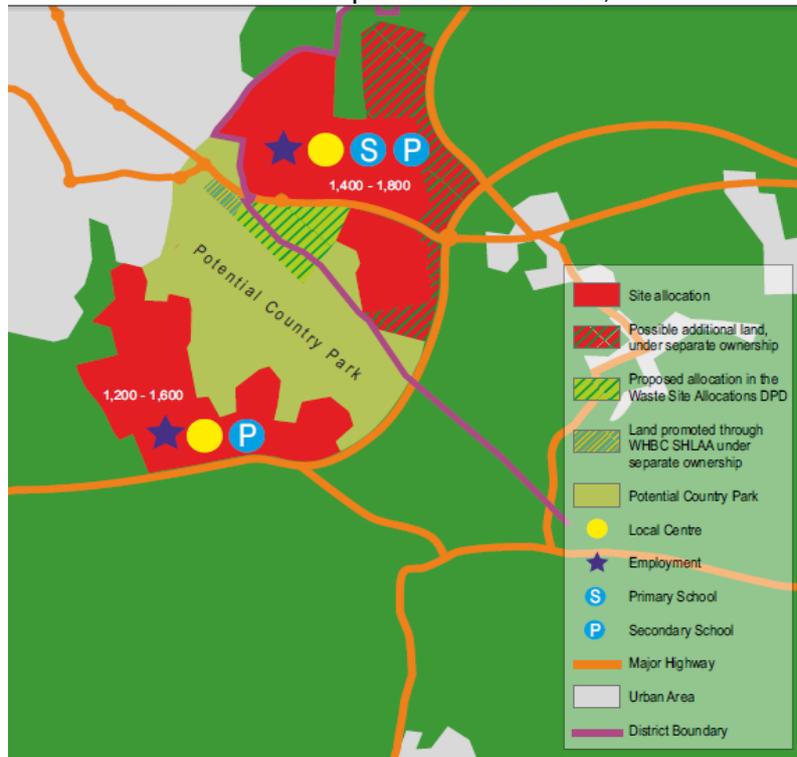
2. Consultation Responses

- 2.1 Comments were received to the 2014 Preferred Options Consultation both in support and against development to the East of Welwyn Garden City. Where objections were received, these focused on the loss of land from the Green Belt and the issue of coalescence between Welwyn Garden City and Hertford, leaving only Panshanger Park separating the two towns.
- 2.2 A full summary of the issues that were raised in respect of the draft Policy EWEL1, land to the East of Welwyn Garden City and the Officer proposed responses to them were considered by Members at the District Planning Executive Panel meeting

on 21st July 2016. These can be viewed via the following link:
<http://democracy.eastherts.gov.uk/ieListDocuments.aspx?CId=151&MId=2951&Ver=4>

- 2.3 The two largest land owners; Lafarge Tarmac (now Tarmac) and Gascoyne Cecil Estates submitted lengthy responses detailing how their sites should form part of the development strategy. English Heritage (now Historic England) indicated that a further detailed assessment of the potential impact of development on the Grade II* registered Panshanger Park should be undertaken.
- 2.4 David Lock Associates on behalf of Tarmac submitted indicative plans for the site, which they called Birchall Garden Suburb, which included a transport assessment and utility report. They also objected to the creation of a Development Plan Document, which they suggested would add an unnecessary delay to bringing the site forward for development, suggesting that the site could be delivered within the first five years of the Plan period.

Figure 1: Tarmac Rpresentations to the East Herts District Plan Preferred Options Consultation, 2014



- 2.5 Gascoyne Cecil Estates (GCE) submitted an objection to the site on the basis that it conflicted with their wider interest in retaining a green infrastructure corridor comprising wider estate landholdings along an east-west axis. GCE were supportive of the Broad Location and DPD approach as a means of comprehensively considering the cumulative impacts of development on this site and in the wider area around Welwyn Garden City. GCE also submitted an alternative approach to development in the form of a village expansion programme called 'The Greens'. This alternative is considered in section 10 below.

Figure 2: Green Infrastructure Corridor (Gascoyne Cecil Estates submission to the East Herts District Plan Preferred Options Consultation, 2014)



3. The Emerging Strategy

- 3.1 Following the consultation, further work has been undertaken on the District Plan, which has led to the reconsideration of some elements of the proposed strategy.
- 3.2 In January 2016, the Council met with a Planning Inspector who advised that the Council needed to provide more certainty over the delivery of its emerging strategy. This was in the context of the approach to Broad Locations and the use of Development Plan Documents. The Inspector suggested that where the emerging strategy included very large strategic sites which made up a large proportion of the overall housing number, where it was possible, these locations should become allocations in the District Plan. In the case of land to the East of Welwyn Garden City, as the area would form part of two local plans, an allocation and a joint policy approach within the two plans would provide certainty and show the commitment of both authorities to bringing the site forward for development. The potential to review Green Belt boundaries along clear defensible features was considered a strength, along with a large amount of available land.
- 3.3 In order to support this approach, Officers from both authorities have undertaken detailed discussions, including the consideration of Green Belt boundaries and heritage impacts among other issues. These technical assessments are summarised below. Following these assessments Officers now consider that there is sufficient evidence in place to support an approach which confirms that the site will be allocated in both the East Herts District Plan and Welwyn Hatfield Local Plan, supported by a jointly prepared detailed policy setting out the expectations for the site. The joint policy will be supported by a concept diagram which will form the

starting point of a masterplanned approach to the development. The masterplan will be prepared collaboratively, i.e. between the local planning authorities, the developers and other community groups and stakeholders. This process can be undertaken prior to the examination in public in order to support the Plan through the examination. In this way, there will be no delay in the submission of a planning application once the Plans have been adopted. Until both Plans are adopted the site will remain in the Green Belt.

4. Technical Assessments

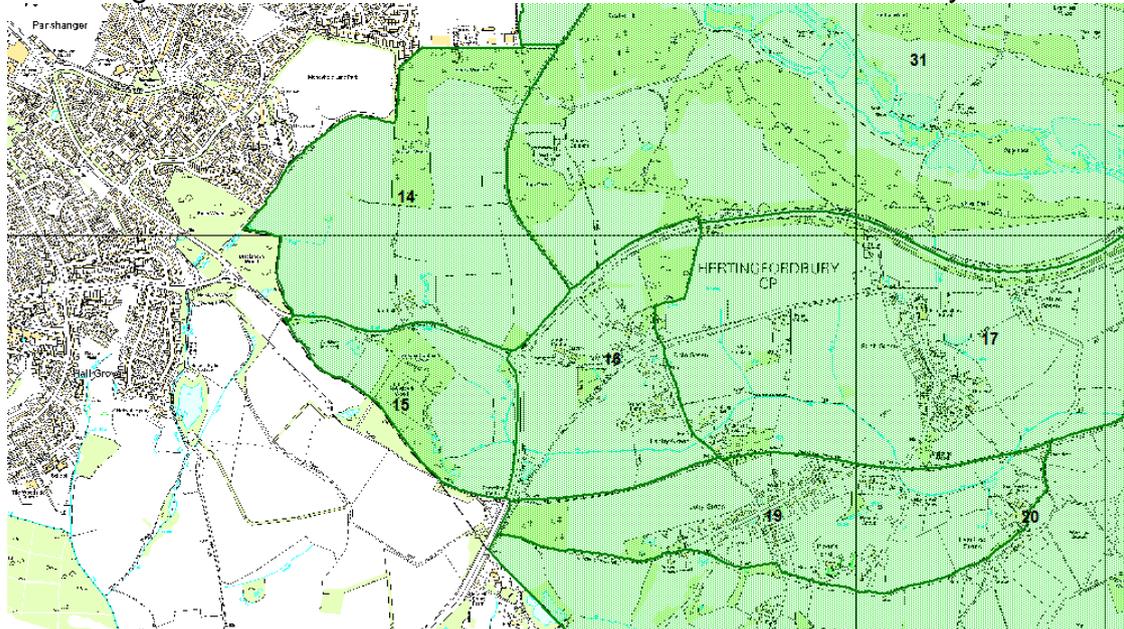
- 4.1 The following sections summarise the various technical evidence based assessments that have been undertaken to assess this site alongside the wider Plan preparation process.

East Herts Green Belt Review 2015 (Peter Brett Associates)

- 4.2 The 2015 East Herts Green Belt Review assessed land to the East of Welwyn Garden City. Parcel 14 covered the land north of the B195 to Panshanger Lane in the east and the built up western edge of Welwyn Garden City. The parcel was considered of paramount importance in checking the unrestricted sprawl of large built-up areas, which in this case was Welwyn Garden City; was of slight or negligible importance in preventing neighbouring towns merging; was of paramount importance in safeguarding the countryside from encroachment; and no contribution to preserving the setting and special character of historic towns. The parcel scored very low in terms of its overall suitability as an area of search based on its contribution to the Green Belt purposes.
- 4.3 Parcel 15 covers land within the East Herts boundary and the B195. The parcel was considered of major importance in checking the unrestricted sprawl of large built-up areas, which in this case was Welwyn Garden City; was of slight or negligible importance in preventing neighbouring towns merging; was of paramount importance in safeguarding the countryside from encroachment; and no contribution to preserving the setting and special character of historic towns. The parcel scored low in terms of its overall suitability as an area of search based on its contribution to the Green Belt purposes.
- 4.4 It is common in Hertfordshire that 'countryside' activities and land uses immediately about the urban edge, therefore any development on the edge of a town will conflict with Purposes 1 and 3 of the Green Belt (checking unrestricted sprawl and protecting the countryside from encroachment). Whilst the development extending out from the town could be considered as separate and unrelated to the town due to the presence of woodland blocks and open spaces, these assets also provide an opportunity to link in to the existing residential areas of the town. Planned development is also not sprawl, particularly when the development itself will create a new outer edge through land uses and structural planting. By redefining the Green Belt along the A414 and Panshanger Lane the strongest possible boundary features will be used, creating a more robust Green Belt boundary. It is the view of Officers that while development will extend into currently agricultural land, the creation of a large common with new and enhanced connections through the site to the countryside beyond offsets the loss of agricultural land which is largely

inaccessible.

Figure 3: East Herts Green Belt Review Parcels identified by PBA



Welwyn Hatfield Green Belt Review 2014

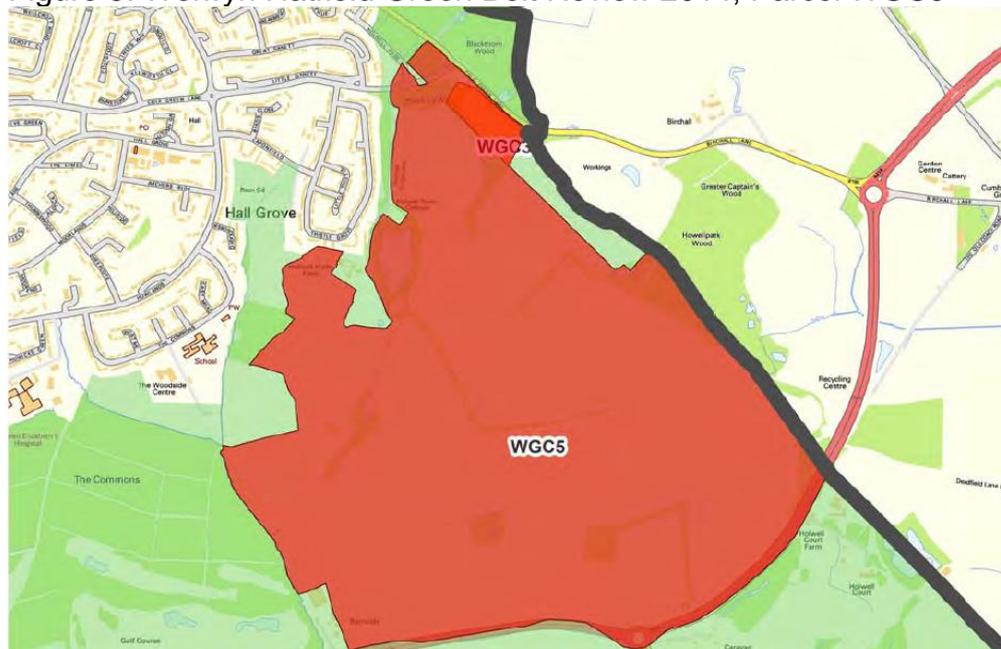
- 4.5 Welwyn Hatfield Borough Council completed their two-stage Green Belt review in October 2014. The Welwyn Hatfield Green Belt Review took a different approach to assessing the purposes of the Green Belt. For example, Purpose 1 considered the contribution a parcel made to checking the unrestricted sprawl of large built-up areas, which for the purposes of this assessment, were defined as London, Luton, Dunstable and Stevenage.
- 4.6 Parcel WGC3 covers the land at the Holdings, which lies immediately adjacent to the built-up edge of Welwyn Garden City, south of the B195. This site was considered to have limited or no contribution to checking sprawl in this context; made a partial contribution to preventing towns from merging, made a partial contribution to safeguarding the countryside from encroachment; and had limited or no contribution to preserving the setting and special character of historic towns. A fifth purpose was assessed which considered whether the site maintained the existing settlement pattern. This site was considered to contribute significantly to this assessment.

Figure 4: Welwyn Hatfield Green Belt Review 2014, Parcel WGC3



4.7 Parcel WGC5 covers the remaining land between the B195, the A414 and the eastern edge of the town. This site was considered to have limited or no contribution to checking sprawl in this context; made a partial contribution to preventing towns from merging, made a significant contribution to safeguarding the countryside from encroachment; and had limited or no contribution to preserving the setting and special character of historic towns. A fifth purpose was assessed which considered whether the site maintained the existing settlement pattern. This site was considered to contribute significantly to this assessment. The assessment for this site indicated that the significant contribution to safeguarding the countryside from encroachment arises from its visual and physical openness and the lack of development within the site.

Figure 5: Welwyn Hatfield Green Belt Review 2014, Parcel WGC5



- 4.8 It should be noted that neither the East Herts nor the Welwyn Hatfield Green Belt Reviews considered land within the other neighbouring authority and there is therefore no single assessment that consistently assesses the whole of the land under consideration in this appraisal. What both Reviews show is that the current open nature of the area means that any development would have an impact in terms of countryside encroachment, but that potentially strong boundaries exist that could redefine the edge of the town.
- 4.9 Advice received from the Planning Inspector in January 2016 stated that to plan positively for the delivery of this site, the Green Belt boundary would need to be amended at this stage along defensible boundaries and indicated as such within the two local plans. Officers from the two authorities have conducted on-site assessments and have determined appropriate locations for a revised Green Belt boundary which will provide a firm outer edge to development, thus reducing the need to revise boundaries again in this location beyond the Plan period of the two local plans. These are shown on the Concept Diagram within the Draft Chapter.

Transport Modelling

- 4.10 David Tucker Associates, working on behalf of Tarmac have produced a Transport Assessment which they submitted as part of their representations to the Preferred Options District Plan. This assessment suggests that the majority of vehicle movements associated with the development of homes in this location would travel westbound, either to locations within Welwyn Garden City or to the A1(M) and beyond. The assessment tested approximately 3,000 homes (1,200 homes within Welwyn Hatfield and 1,800 homes within East Herts), and assumed that some trips would be contained within the development due to the provision of services and facilities within the site reducing the need to travel to meet day-to-day needs. The development will be supported by a transport strategy to deliver high quality public transport/cycle connections to key destinations (railway stations, town centre, hospital and key employment areas in Welwyn Garden City and Hertford).
- 4.11 In addition to the assessment of the site through the County's Diamond Model in 2013, the developer has commissioned a detailed run of the WHASH Model (Welwyn Hatfield, Stevenage and Hitchin Model). This model will need to be considered in relation to the wider Hertfordshire County Council County-wide transport model known as COMET. COMET seeks to bring together the plethora of models used by district and borough councils and those developed through individual commissions for particular sites or settlements in response to planning applications or proposals. The County Council has advised that they have no objection in principle to the allocation of this site for future development.
- 4.12 Hertfordshire County Council Highways has advised that there are no issues that are unsurmountable, but detailed modelling will need to be undertaken by the developers to assess the feasibility and potential impacts arising from proposed junction alterations. The primary concern is that the alignment of roads and the introduction of new junctions do not cause highway safety concerns for users. Mitigation measures will need to be tested and incorporated into the masterplan in

due course.

Heritage Impact Assessment for Panshanger Park and its Environs

- 4.13 Beacon Planning Ltd was jointly commissioned by East Herts Council and Welwyn Hatfield Borough Council in October 2015 to prepare a Heritage Impact Assessment to consider the potential impact of development to the East of Welwyn Garden City and west of Hertford on the significance of Panshanger Park and heritage assets in the vicinity of the Park. This work follows the publication of each authority's Local Plan consultation in 2014 and 2015, and resulted from representations made by Historic England to each consultation. Historic England advised that they would like to see further evidence gathered as to the significance of heritage assets in the vicinity of potential site allocations presented in each Plan.
- 4.14 The Panshanger Park is a Grade II* Registered Park and is considered by Historic England to be most at risk from development, but other historic assets were also highlighted in the Historic England representations, including the Grade II listed Holwellhyde Farmhouse and Grade II listed Birchall Farmhouse, Barn and Stables. The Panshanger Aerodrome buildings are of local importance but are also noted for their historic significance and setting.
- 4.15 Nearby Grade I listed Hatfield House and Palace and Grade I listed Historic Park and Garden (and ancillary Grade II listed buildings) is a key heritage asset. There are wide reaching views out of and towards the House from surrounding landscapes, and the wider rural character of this area forms part of the setting of the House. Therefore the southern-most part of the Birchall Garden Suburb proposed development (within Welwyn Hatfield) may encroach into this setting, although the distance would mitigate the potential impact to a reasonable degree.
- 4.16 The assessment therefore recommends that areas of undeveloped land are incorporated into the Masterplan for the site to ensure there is a landscape buffer between heritage assets and built development. This will particularly affect Holwell Hyde Farmhouse, Birchall Farm and Panshanger Park. These issues are reflected in the Concept Diagram contained in the Draft Chapter.

Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment and Identification of Potential Sites Study

- 4.17 The Council commissioned an Accommodation Needs Assessment in 2014 to identify the needs of Gypsies and Travellers and Travelling Showpeople. The Council also commissioned an Identification of Potential Sites Study in 2014. Subsequent to the publication of revised Government guidance in August 2015 ('Planning Policy for Traveller Sites'), the Council commissioned an update to the Accommodation Needs Assessment in 2016. The Assessment concluded that five Gypsies and Travellers pitches were needed over the Plan period, with two of these to be delivered within the first five years of the Plan. Welwyn Hatfield Borough Council has also identified a need for 61 Gypsy and Travellers pitches, of which 19 will need to be provided in the first five years of the Plan.

- 4.18 Land to the East of Welwyn Garden City is considered a suitable location for the delivery of a site due to the ease of access to the principal road network and because, being a strategic scale development, a site could be planned comprehensively as part of the wider masterplan. As such, Officers are considering the potential for a joint site to meet the respective Gypsies and Travellers needs as part of the emerging masterplan, to meet both short term and longer term needs of both authorities. Therefore a site should be provided which is large enough to accommodate a site for 15 pitches. A proportion of both Welwyn Hatfield's needs (11 pitches) and East Herts' needs (4 pitches) will therefore need to be accommodated through development to the East of Welwyn Garden City.

5. Stakeholder Engagement

- 5.1 In order to move towards the inclusion of the site as an allocation or safeguarded site, it was necessary to consider the wider implications and infrastructure requirements arising from development in this location. Therefore, representatives from the proposed developments to the east of Welwyn Garden City and west of Hertford were invited along with other statutory stakeholders to a Stakeholder Workshop which was held on 16th May 2015 to discuss the potential for around 3,000 to the east of Welwyn Garden City. In addition to East Herts Council Officers, the following stakeholders were represented:

- Welwyn Hatfield Borough Council officers
- Herts County Council – Highways (Development Management, Transport Modelling, Passenger Transport, Strategy and Programme Management)
- Herts County Council – Education
- Herts County Council – Property
- Herts County Council – Minerals and Waste
- NHS England / NHS Hertfordshire
- Thames Water
- JB Planning Associates (for Gascoyne Cecil Estates)
- John Duffield (for Lafarge Tarmac)
- Wardrop Minerals Management (for Lafarge Tarmac)
- David Lock Associates (for Lafarge Tarmac)
- Savills (for David Lock Associates)
- DTA Transport (David Lock Associates)
- London and Regional (for land West of Hertford, North of Welwyn Road)
- Woolf Bond Planning (for land West of Hertford, South of Welwyn Road)

- 5.2 The aim of the meeting was to identify the main issues requiring further testing through the District Plan. The following matters were particularly relevant:

Housing

- As the site straddles the district boundary a close working relationship will be required between the two authorities in the production of any policy documents.
- Masterplanning would need to be undertaken to inform the assessment of the site within each local plan.

Gypsies and Travellers and Travelling Showpeople

- The site should make provision for either a Gypsy and Traveller site or a site for Travelling Showpeople which should be designed in accordance with the Good Practice Guide.

Transport

- In terms of highways, Paramics modelling was being undertaken which indicated that mitigation measures would be required on the A414 roundabouts and on the B195. Detailed discussions would be required between the landowner's consultants and the County Council on the appropriateness of baseline data and assumptions.
- In terms of buses, there is an existing bus network in the area which may require diversions. These routes should ensure connectivity to Hertford North Station and Welwyn Garden City Station. Bus priority measures should be designed in to the development to encourage bus use and to ensure they are self-sufficient.
- New cycle routes should be provided, particularly towards the railway stations.
- In terms of rail networks, it was anticipated that additional capacity could be provided through Thameslink services but pressures exist down the line towards London boroughs.

Waste Water

- In terms of sewage capacity, previously anticipated growth has not been realised, therefore Rye Meads Sewage Treatment Works would have some capacity. With the beneficial impacts arising from changes to the way sewage is treated, the works would have capacity up to 2036. However, connections to existing or new on-site storage tanks would be needed to mitigate and manage flows to avoid impacts downstream.

Education

- The development will need to accommodate all primary education needs arising from the development on-site. This was likely to require two primary schools of two forms of entry.
- At secondary level, a development of 2,500 homes would require a secondary school constructed to accommodate 6 forms of entry.
- To the west of Hertford, all local primary schools were at capacity and 550 homes would require the expansion of existing schools by at least one form of entry. At secondary level the Hertford and Ware school planning area was expected to reach capacity by 2017 so further provision would be needed.

Biodiversity

- In terms of wildlife sites, Herts and Middlesex Wildlife Trust had been in contact with landowners to undertake ecological surveys. Given the cross-boundary nature of the site, such information would need to be cognisant of the development as a whole.

Healthcare

- NHS England would require a new healthcare facility. As there is an existing demand for additional capacity, new facilities should be provided in tandem with development. Therefore discussions with NHS England GP Premises Team and the East and North Herts Clinical Commissioning Group should be undertaken to inform the masterplanning process.

Community Facilities

- Contributions towards other community facilities would be expected including the provision of community facilities on-site.

Minerals and Waste

- As the land is situated in the Hertfordshire Sand and Gravel Belt Hertfordshire County Council would seek to prevent underlying minerals from being sterilised and minerals would need to be extracted prior to development.

6. Developer Meetings/ Information

- 6.1 Since the Stakeholder Workshop several meetings have been held with David Lock Associates and representatives of Tarmac. Each meeting has been attended by both East Herts and Welwyn Hatfield Council officers and focused on discussions over the principal of development and what an evolving masterplan should consider.
- 6.2 In order to assist in its deliberations, the Council invited further information from landowners, developers and agents in the form of Delivery Statements which would form the basis of draft Statements of Common Ground. These statements contain details about required infrastructure and utilities and would be used to support the submission of the Plan to the Planning Inspectorate. They also form the basis of the delivery assessments below.

7. Deliverability Assessment

Introduction

- 7.1 This deliverability assessment section sets out answers to typical queries raised by Inspectors at examination stage. It is a useful way of illustrating that a site is deliverable and that if issues have been identified, that mitigation options are employed and that if mitigation is possible but not yet resolved, there is a clear mechanism for addressing these issues.

Aims & objectives

- 7.2 Development on land to the East of Welwyn Garden City, known as Birchall Garden Suburb will create a sustainable urban extension to Country's second pioneering Garden City. The development will provide approximately 2,550 homes straddling the local authority boundary, of which 1,350 will be within East Herts and 1,200 within Welwyn Hatfield.
- 7.3 The development will comprise a mix of new homes and community facilities including schools, new employment land and open spaces and a site for Gypsies and Travellers.

Identification of site constraints

Green Belt

- 7.4 The site is currently located within the Green Belt, with the inner Green Belt boundary which is drawn tight against the built-up edge of Welwyn Garden City. By

allocating this site in the District Plan the Green Belt boundary will be re-drawn. It is not considered necessary to seek to compensate for the loss of Green Belt by the creation of new Green Belt in this location. Local concern is that the development of this site will cause coalescence between Welwyn Garden City and Hertford and will cause the loss of any separation between adjacent villages and the town.

Minerals

- 7.5 The site is situated within the Hertfordshire Sand and Gravel Belt. It is clear from discussions with Hertfordshire County Council in their capacity as Minerals and Waste Authority, that the known mineral asset within the East Herts element of the site should not be sterilised through built development.

Land Contamination / Former Landfill

- 7.6 Starting in the 1930s, a vast artificial plateau was created to the south of Birchall Lane when a gravel extraction complex was filled with waste material from London. Since then the land has returned to secondary grassland and arable use. Recent testing of the site has indicated that part of the land is unsuitable for development, though areas around the outskirts of the former landfill area are not affected by the waste material and are therefore developable.

Surface Water Flooding

- 7.7 The site is in proximity to the River Lea to the south of the A414 and the River Mimram to the north of the site beyond the former Panshanger Aerodrome site. There are a number of brooks that run through the development site following existing land contours. Evidence of surface water flooding exists and will therefore need to be taken into account during the masterplanning of the site. There are therefore opportunities to integrate these features, making them into multi-functional green spaces rather than to rely on engineered solutions.

Heritage Assets

- 7.8 There are a considerable number of heritage assets within and around the site. The most notable of these include the Grade II Historic Park at Panshanger Park, Grade II* Hatfield House and Gardens, Listed Buildings at Holwell Hyde Farm and Birchall Farm and Conservation Areas at Essendon and East End Green. These assets have been considered in detail through the Heritage Impact Assessment for Panshanger Park and its Environs. The Assessment indicates that mitigation will be required to minimise impacts on the closest heritage assets.

Landscape

- 7.9 The area wraps around the edge of Welwyn Garden City, where urban fringe land uses and activities including mineral extraction and recreation. Much of the historic alluvial floodplain and estate pattern of the landscape has been disturbed or lost to development, mineral extraction or World War II disturbance. The landscape has been used to locate utilities necessary for nearby urban centres, with a lack of coherence in terms of land uses. Such uses (minerals, landfill, utilities such as pylons and road networks) are the main visual impacts in the location. Mature hedgerows and woodland break up views across the landscape and define field boundaries. The Commons woodland block is regarded as a unique area ecologically. While the Lea Valley Walk/Cole Green Way and other cycle networks provide connectivity between Welwyn Garden City and Hertford providing links to the countryside beyond the two towns.

7.10 The condition of the landscape is considered poor with a moderate sense of character, which should be improved and restored. This could be achieved through increasing hedgerows, expanding woodland areas and through buffer planting between uses. The assessment indicates that should further mineral extraction occur the restoration should conform to existing landform and land use. Therefore it will be necessary to address matters such as extraction methods, development phasing and land restoration to an appropriate development platform as part of the masterplanning work.

Environmental Impact Assessment Scoping

7.11 The Developer submitted an Environmental Impact Assessment Scoping Opinion, in response to which, East Herts, Welwyn Hatfield and Hertfordshire County Council prepared a joint response. The joint response raised a number of issues that would require further consideration prior to the submission of a planning application. These include the treatment of energy conservation, water management and waste minimisation and a full technical assessment of the possible waste arisings that may be generated during constructional and operational phases of the development.

7.12 In addition, the joint response raises the issue of the cumulative impacts from this site in relation to a number of sites in Welwyn Hatfield Borough and East Herts District. The response also states that infrastructure required whether on or off site will need to be confirmed, including the provision of a site for Gypsies and Travellers. Furthermore, a Construction Management Plan will be required including a Code of Construction Practice setting out phasing and duration of development and a detailed programme of activity on the site. This is particularly necessary given the proposed mineral extraction and progressive restoration/development strategy being considered.

7.13 It is the view of Officers that these issues can be satisfactorily resolved through a collaborative approach to masterplanning the development. This will ensure that all necessary considerations are resolved in advance of the planning application process. Through the masterplan, the following land uses and proposals will be established.

Land uses and proposals

7.14 The development will comprise a mix of tenures, including affordable and aspirational homes as well as specialist residential provision for older people (such as retirement bungalows and apartments, flexi-care and residential care homes). In addition, a site will also be provided for Gypsies and Travellers. The new homes will be supported by a range of community facilities located around two neighbourhood centres (one in East Herts and one in Welwyn Hatfield). A two-form entry primary school with early years provision will be located within the Welwyn Hatfield part of the site, while an all through-school of six-forms of entry at secondary level and two forms of entry at primary level with early years provision will be located within the East Herts part of the site. Importantly, the through-school site will provide sufficient flexibility to accommodate up to eight forms of entry at secondary level and three forms of entry at primary level should future needs arise.

- 7.15 Important heritage assets within and in the vicinity of the site will be protected through adequate mitigation which will include maintaining open or landscaped areas where necessary. Land uses which can contribute towards maintaining these buffers will be located where required, such as locating the all through-school or public open space or sports pitches to the eastern edge of the site where the built form can provide a clear boundary, with the visually less intrusive features of the playing fields contributing to the softer edge of the development as well as a buffer between the development and heritage asset of Panshanger Park.
- 7.16 Open spaces will be provided which provide multi-functional drainage solutions as well as space for recreation, creating connections to green infrastructure corridors including the Mimram and Lea Valleys. Formal open spaces will be provided through the creation of a large common/informal parkland utilising the former landfill part of the site within Welwyn Hatfield. The site will also make provision for playing pitches and play spaces as well as community orchards and allotments. Areas of ecological importance will be protected and enhanced through appropriate buffer planting and an appropriate land management strategy.
- 7.17 Sustainable Urban Drainage will be incorporated into the layout of the development and will create multi-functional green spaces. The site will incorporate Garden City principles, supported by a masterplan and Supplementary Planning Document which will set out details such as character and design. A key aim of the two authorities is the retention and enhancement of the green corridor which runs through the site connecting east and west between St Albans and Hertford and beyond. Areas of woodland and hedgerows will be extended through buffer planting and will contribute to wider ecological networks. Areas of open space and community orchards and allotments will also contribute to this green infrastructure. Street trees should also be an integral part of the design of the site creating not only pleasant urban greening but to create a net gain in terms of biodiversity across the site, which is currently arable farmland.
- 7.18 Development within the East Herts part of the site to the north of Birchall Lane will be a more compact urban form, while land to the south of Birchall Lane is likely to take the form of connected villages in order to fit well within the landscape. The larger neighbourhood centre will be located to the north of Birchall Lane where access can be achieved from the main road. A smaller local centre will be located to the south of the site where it can be co-located with the primary school, thus creating a natural centre to the development.
- 7.19 An important aspect of the development will be its connectivity within the site and to the existing town. Walking and cycling and bus connectivity will be prioritised over car users to encourage a shift towards more sustainable means of transport. Existing Rights of Way will be enhanced, improving links within the site and to the countryside beyond. Existing bus routes can be extended into the site creating bus connectivity to Welwyn Garden City town centre and train station. Local education, health and retail opportunities will serve to make the development sustainable, reducing the need for travel as well as providing local job opportunities. This will have multiple benefits including contributing to the health and wellbeing of residents.

- 7.20 New employment land has recently been granted permission by Welwyn Hatfield Council at the Holdings, Birchall Lane. The masterplan will seek to increase this employment land to the site currently occupied by BP Mitchell. Birchall Lane is a key route in to Welwyn Garden City from the east; therefore employment space will be highly visible and will contribute towards the creation of a new employment corridor.

Infrastructure needs

- 7.21 The County Council's latest evidence indicates that there are existing capacity issues within local schools at both primary and secondary level, and that the expansion of secondary schools within Welwyn Garden City would not meet the needs arising from the existing population. When taking the cumulative needs arising from development within and around Welwyn Garden City, there will be a forecast need of 11.5 forms of entry. Whilst the evidence indicates that a development of 2,550 homes would trigger the need for five forms of entry a site will need to be provided to accommodate up to 8 forms of entry at secondary level, which will need to be delivered in a phased approach in tandem with the earliest phases of development. This development would also be expected to provide in full the primary level needs arising from the development on-site. As such, two primary schools (both with two forms of entry, one of which can be expanded to three forms), one of which could be co-located with the secondary school. Approximately 12 to 15 hectares of land will be required for the secondary school and between 2.6 and 3 hectares for the primary schools. The detail of location, access and layout will be determined through the masterplanning process.
- 7.22 An important part of any neighbourhood is access to local primary healthcare facilities such as doctors and dentists. This will be particularly necessary given the site will need to deliver a range of housing type and tenure, including housing for older and vulnerable people, which have a greater demand for local healthcare services.
- 7.23 The site will require upgrades to the B195, Birchall Lane in terms of new roundabouts and road realignment. There will also need to be upgrades to the A414 roundabouts to mitigate additional vehicle movements arising from the development. In the short term the improvements to Birchall Lane will be required to facilitate vehicle movements arising from the mineral extraction process.
- 7.24 The provision of utilities to serve the proposed development has been assessed as part of the Environmental Impact Assessment. Evidence submitted indicates that that there were no anticipated issues with regards to the provision of utilities and that improvements to and connections to existing utility infrastructure are feasible. The development will integrate communications infrastructure into the design of the site to ensure good broadband connectivity for both residents and community and commercial properties.
- 7.25 Thames Water has confirmed that the Rye Meads Waste Water Treatment Works has the capacity to serve the development. The sewerage implications of the proposed development have also been assessed through the Environmental Impact Assessment. The Water Company (Thames Water) has designated Rye Meads as the relevant sewage treatment works, located approximately 18km downstream of

the site. Even without new capacity at these works, capacity is available to deliver the proposed development through attenuation of sewerage flows from the development. Two options for achieving that attenuation, both of which are under the control of Tarmac, include enlarging a section of tank sewer downstream of the site and creating a balancing tank at an adjacent foul water pumping station.

- 7.26 The site will incorporate opportunities for surface water attenuation such as suds and swales making use of natural landscape features before using engineered solutions. It is therefore important that the post-mineral extraction landscape is restored to an appropriate development platform which respects the current landform.

Delivery Study

- 7.27 The East Herts Strategic Sites Delivery Study, September 2015 is a technical document which assessed the financial viability and deliverability of the proposals contained in the Preferred Options District Plan. The Delivery Study assessed development to the East of Welwyn Garden City for 1,700 dwellings within East Herts, acknowledging the further development within Welwyn Hatfield, which was, at the time of the Study, between 1,400 and 1,800 dwellings. The Study appraised viability based on high level cost assumptions for the East Herts portion of the development.

- 7.28 The Study concluded that deliverable solutions to critical infrastructure (particularly sewage, utilities, site access and provision of a secondary education) needed to enable the development to take place have been identified and shown to be achievable for the joint scheme incorporating the Welwyn Hatfield portion of development. Mechanisms will be needed to ensure contributions across the local authority areas are managed appropriately. It also suggests that mechanisms should be in place for the sustainable management of woodland and open space to ensure their longer term maintenance. This could be in the form of a community trust, embracing the Garden City principles that first founded the town. The detail of phasing and delivery will be contained in the Supplementary Planning Document, which will also set out the approach towards planning obligations or a Community Infrastructure levy if appropriate.

Implementation Route Map: Masterplan, Phasing and Delivery

- 7.29 Given the complexities of the site such as the need to extract mineral reserves and the fact that the site straddles two authorities, there is sufficient justification to prepare a Supplementary Planning Document (SPD) for the site in order to plan for these issues appropriately. The site will be allocated in each local plan with land removed from the Green Belt to facilitate the development. This will provide assurances that the Councils are committed to bringing the development forward. The SPD approach ensures that there are sufficient opportunities to engage interested parties in the planning of the site.

- 7.30 There are risks involved in this approach, namely that the landowners will not wish to engage in this process and may instead seek to progress straight to a planning application. However, there are risks to the applicant in this route, namely that the

proposal would not have the support of the community or the relevant planning authorities.

- 7.31 Once Welwyn Hatfield and East Herts Councils have launched their Pre-Submission Local Plan consultations, officers will start the process of agreeing Delivery Statements or Statements of Common Ground as appropriate with landowners/developers in support of the Examination in Public of each Local Plan. These will form the basis of the SPD which importantly introduces the opportunity to engage interested parties in the preparation of the masterplan for the site, which is a key aspect of Garden City principles.
- 7.32 The preparation of the SPD will occur in the months intervening the submission of the two Local Plans to the Planning Inspectorate and the Examination in Public and subsequent adoption. By using this approach there will be no delay to the determination of the planning application.
- 7.33 The start date of development is subject to the adoption of the Plan, with the first year of delivery discharging conditions and setting each site up in terms of infrastructure. Tarmac suggest that construction will commence in 2018, with the first occupations assumed in late 2018 / early 2019. Completion of the proposed development is assumed in 2031. This presupposes an annual average build rate of 200 homes per year delivered by up to three house-builders on site plus an affordable housing constructor.
- 7.34 Land to the north of Birchall Lane will be subject to a period of mineral extraction and land remediation lasting at least 5.5 years. Residential development will follow in a phased manner while later stages of mineral extraction are still underway. However, areas to the south of Birchall Lane will be able to come forward at an earlier stage in the Plan period.
- 7.35 Given the cross-boundary nature of the site, there needs to be careful consideration of the phasing of new homes and the delivery of community infrastructure, in particular the schools which will be required from the earliest occupation. The neighbourhood centres and bus networks will also need to be delivered alongside the homes to ensure that new residents will have access to an appropriate level of services and facilities and to encourage the use of non-car modes of transport.

8. Duty to Co-operate

- 8.1 Several Duty to Co-operate meetings have been held at Executive Member level and Officers have a very good working relationship, meeting regularly to discuss a range of subjects. Records of each Member level meeting are reported to the East Herts District Planning Executive Panel and collectively serve as demonstration of the Council's commitment to fulfilling the Duty to Co-operate in full.
- 8.2 A Memorandum of Understanding (MoU) has been jointly prepared to assist with each council moving forward to examination. It sets out how the two authorities will work together with regards to the Birchall Garden Suburb site and in the preparation of a joint policy and masterplan for the site, engaging relevant parties at appropriate stages, including the County Council in its capacity of Minerals and Waste,

Highways and Education Authority, parish councils and other stakeholders as necessary.

- 8.3 The MoU also establishes the process of managing the anticipated planning application for the site, which could include aligning the decision-making processes. Importantly, the MoU provides the basis for a consistent and comprehensive approach towards the Plan-making and longer term management of the site.

9. Neighbourhood Planning

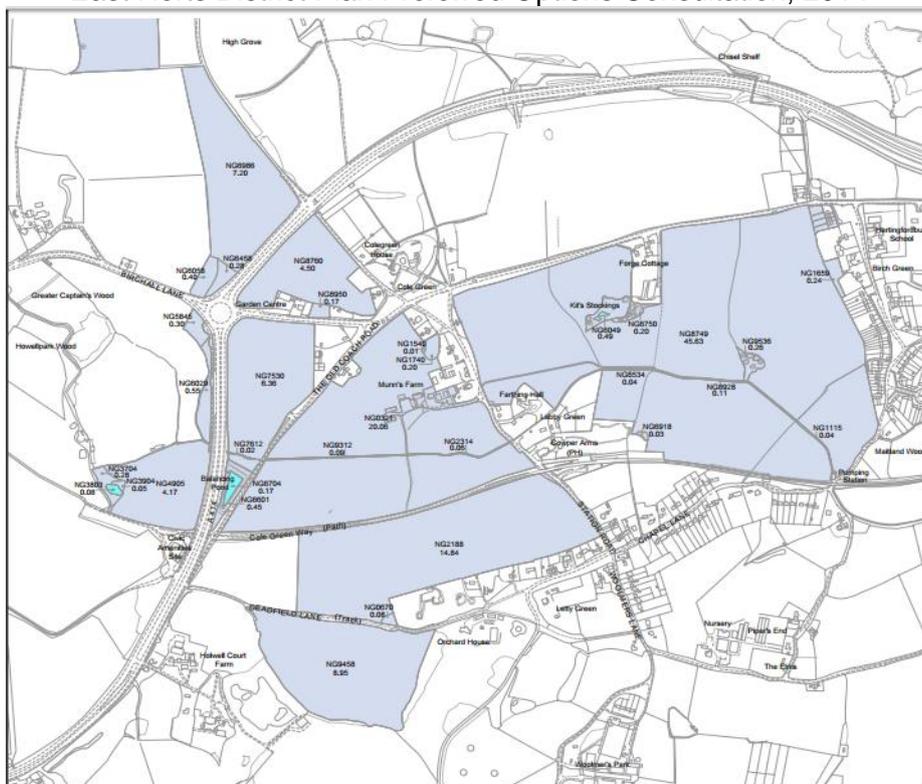
- 9.1 Hertingfordbury Parish Council has a designated Neighbourhood Area which covers the entire parish and intend to produce a Neighbourhood Plan. The element of Birchall Garden Suburb within East Herts lies within the parish. While there is currently no adopted or emerging Neighbourhood Plan at this stage, it is intended that the Neighbourhood Group are fully engaged with the preparation of the masterplan for the site.

10. Consideration of Alternative Sites

- 10.1 As part of the Plan-making process it is necessary to consider whether there are alternative options to the proposed development. Having identified that land to the East of Welwyn Garden City is suitable in principle for development, it is also necessary to consider whether there is an alternative location in which to accommodate a similar amount of development. The Strategic Land Availability Assessment is one means of looking at other locations and forms of development.
- 10.2 Gascoyne Cecil Estates submitted 127.21 hectares of land to the Call for Sites process in 2009, which comprised land to the north and south of Birchall Lane adjacent to the land presented by Tarmac as well as a large area of land around a number of villages to the south of the A414, which is collectively considered under site reference 26/004 in the Strategic Land Availability Assessment. The submission is made up of a number of large greenfield sites within the Green Belt linking Hertingfordbury, Birch Green and Letty Green below the Old Coach Road.
- 10.3 The assessment concluded that although the land around the villages was presented as being available, there are fundamental concerns with the approach presented – the considerable expansion of several villages. The submission suggests that the area could provide small-scale development in keeping with the character of the existing settlements. However, there are a number of features of historic and environmental importance in the locality and large parts of the area are identified as Areas of Archaeological Significance. Hertingfordbury, Birch Green and Letty Green are currently Category 3 Villages washed over by the Green Belt, where there is a presumption against development. The emerging District Plan identifies Hertingfordbury and Birch Green as Group 2 Villages, within which only infilling would be permitted. The development proposed by GCE takes the form of expansions outside the built up areas of the villages and as such would not constitute infill development, therefore the sites and therefore this option are not considered suitable.
- 10.4 Land to the East of Welwyn Garden City has been identified to meet the needs arising from both East Herts and Welwyn Hatfield, therefore development solely

within East Herts would not accommodate Welwyn Hatfield's needs. A dispersed pattern of development would also not provide the necessary infrastructure required to support the development, nor the critical mass required to justify the creation of new infrastructure such as schools, bus public transport services and healthcare facilities. There is no capacity at the primary school in Birch Green and no means to expand the school. The development would increase demand for secondary school provision, which would have to be accommodated in the two towns, where there are already capacity issues. While there are a number of community facilities and services spread amongst the settlements, they are not considered to be sufficient to support the proposed form of development. It is also unlikely that the Hertingfordbury Parish Neighbourhood Plan would support this option.

Figure 11.6: Gascoyne Cecil Estates land ownership as submitted to the East Herts District Plan Preferred Options Consultation, 2014



11. SA objectives

- 11.1 The Sustainability Appraisal is an integral part of Plan-making. This Settlement Appraisal forms part of the Sustainability Appraisal process as it considers the impacts arising from development and a consideration of alternative options. To assist the broader District-Wide Sustainability Appraisal, each of the urban extension options and the proposed development strategy for each East Herts town has been assessed against the Sustainability Appraisal Framework as updated by the Strategic Housing Market Area Spatial Options Distribution work. The appraisal of land to the East of Welwyn Garden City below describes how the site will meet the objectives as set out in the Sustainability Appraisal Framework. The wider likely cumulative impacts of development will be assessed in the Sustainability Appraisal supporting the District Plan.

Air Quality

- 11.2 The site is not near to an Air Quality Management Area (AQMA) and is not considered likely to exacerbate air quality issues. The site will have incorporated Garden City principles which include tree-lined avenues. Buffer planting required to minimise and mitigate impacts on areas of woodland will increase biodiversity across the site mitigating air quality impacts arising from increased vehicle movements and buildings.

Biodiversity and Green Infrastructure

- 11.3 There are a number of wildlife sites within or near to the proposed development which comprise areas of ancient woodland, coppiced wood, species rich grassland and ponds home to protected species. The Cole Green Way is former railway line which runs east to west through the site, which over time has become an important wildlife corridor. Mitigation will therefore be required which will be achieved through the retention, expansion and positive management of woodland areas, landscape belts and enhanced green infrastructure corridors through the site as well as through well designed streets and urban blocks along Garden City principles.

Community and Wellbeing

- 11.4 The proposed housing mix and tenure and range of community facilities will support all age ranges, including the needs of an ageing population. The provision of bungalows and assisted living units will also provide for those with specialist physical needs. The neighbourhood centres will provide local shops and healthcare services as well as local sources of employment. Early Years, primary and secondary education will also be provided on-site. The use of Garden City principles, along with the provision of formal, informal and accessible natural green space, outdoor sports and play spaces as well as an allotment and community orchard provide valuable contributions to health and wellbeing objectives.

Economy and Employment

- 11.5 The site is located on the key east-west A414 corridor which is a major travel to work corridor through southern Hertfordshire providing links to major towns along key transport networks. The site not only provides employment opportunities through the creation of education, retail, community and healthcare facilities on site, but will also benefit from new modern employment space at The Holdings. The B195 is a key route in to the centre of Welwyn Garden City, providing good access to the many employment areas and the commercial centre of the town.

Historic Environment

- 11.6 The site lies within an Area of Archaeological Significance. As such, detailed assessments including archaeological field evaluations have been undertaken by Tarmac. There are many heritage assets within and in the vicinity of the site. However, degradation of their settings have occurred over time through various land uses and activities. The Heritage Impact Assessment concludes that where impacts may occur to the settings of heritage assets there are a variety of mitigation measures that can be incorporated in to the masterplanning of the development. These include buffer zones, reduced storey heights, layouts and design codes. These measures could assist in the modern interpretation of the landscapes which gave the heritage assets their original significance.

Housing

- 11.7 The proposal provides for a wide range of house types and mix, with an appropriate quantum and mix of affordable housing, bungalows, family sized homes, aspirational homes, a care home and assisted living properties. A site will also be provided for Gypsies and Travellers which could be delivered within the first five years of the Plan period.

Land

- 11.8 There will be a variety of densities across the site ensuring that the land is used efficiently but in a manner that respects the edge of settlement location within a landscaped setting. The land is currently in agricultural use as arable fields. The extraction of sand and gravel will be required to the north of Birchall Lane so a process of land remediation will need to be planned to create a development platform that respects the existing land form. Some of the material extracted will be used on-site to form buffer areas and for construction material.

Landscape

- 11.9 The landscape in this area is a key contributor to the significance of the setting of many heritage assets in the locality. The landscape has been shaped through the designs of Humphrey Repton and Capability Brown, linking large estates and manors together through parklands and rural landscapes. Much of this landscape has been degraded through land use changes and activities such as intensive agriculture and mineral extraction and land remediation. The Heritage Impact Assessment concludes that where impacts may occur to the landscaped settings of heritage assets there are a variety of mitigation measures that can be incorporated in to the masterplanning of the development. These include buffer zones, reduced storey heights, layouts and design codes. These measures could assist in the modern interpretation of the landscapes which gave the heritage assets their original significance.

Low Carbon Development

- 11.10 The site will incorporate footpaths and cycleways and facilitate a bus route through the site connecting to the existing town, thus facilitating the use of alternative modes of transport. The site will not support a decentralised heating system but will comprise buildings that incorporate sustainable building features exceeding building standards. On-site flood attenuation measures will be a fundamental element of the overall design of the site, incorporating natural drainage features and the creations of suds and swales.

Transport

- 11.11 The development site is well located to provide good connections to and extend the network of off-road cycle routes that connect Welwyn Garden City to Hertford (the Cole Green Way). Cycleways and footpaths will be incorporated into the design in a way which prioritises these routes over the use of private vehicle. Existing bus routes could be extended to run through the development connecting the development to the town centre and railway station within Welwyn Garden City and beyond to nearby Hertford. Transport modelling indicates that anticipated levels of vehicle movements generated by this development would not adversely affect the wider highway network, though the B195 Birchall Lane and junctions on the A414 will need enhancements.

Water

- 11.12 Methods to minimise water consumption through construction and occupation of the development will be utilised and appropriate connections to water supply and waste water networks are possible. The wider Rye Meads Waste Water Treatment Works has capacity with local improvements to connection points required.

12. Conclusion

- 12.1 The Council has undertaken careful consideration of the potential for development in this location, including the consideration of smaller parcels of land. It is considered that the Council's objectively assessed housing need will require the release of land from the Green Belt in order to plan for sustainable patterns of development. This site on the edge of a thriving town will enable new neighbourhoods to be planned that will provide key community services, be well connected to an existing urban area and will provide infrastructure and community facilities that will benefit new and existing residents such as new secondary school, healthcare and open spaces. This edge of town site will also enable connections from the existing urban area to the wider countryside through the improvement and creation of new green infrastructure routes and corridors.
- 12.2 The site will provide new homes in an established travel to work corridor and will provide new employment opportunities. The Council's requirement to provide for the accommodation needs of Gypsies and Travellers can be delivered on this site within the first five years of the Plan. The incorporation of this accommodation within the masterplan will also serve to avoid conflicts between future occupants of the development.
- 12.3 As the site straddles the administrative boundary of Welwyn Hatfield and East Herts, this site provides an almost unique opportunity for two authorities to plan comprehensively to meet the needs of their residents through the creation of new community services and facilities. The masterplan approach and the production of a Supplementary Planning Document will provide opportunities for local engagement in the planning of new neighbourhoods. It will also provide assurances over the long-term delivery of development in line with the masterplan's original aims and objectives. It is therefore proposed that this site becomes an allocation within the East Herts District Plan and Welwyn Hatfield Local Plan for strategic development of 2,550 homes and supporting community infrastructure.

Chapter 13 East of Welwyn Garden City

13.1 Introduction

- 13.1.1 Welwyn Garden City which immediately adjoins East Herts to the east of the district is the Country's second Garden City and therefore has a long history as an innovative and distinctive town. The town's location within the A1(M) corridor means it is highly accessible and as such is home to regionally important employment areas and national headquarters of large businesses. The town and the borough is a key workplace and retail destination for East Herts residents. This results in strong economic and housing market links between Welwyn Hatfield and East Herts.
- 13.1.2 Land to the East of Welwyn Garden City was assessed through the Plan-making process and was identified as a Broad Location for Development. This meant that the principle of development in this location was reserved subject to further detailed assessments which would be considered through the production of a Development Plan Document.
- 13.1.3 Since the Preferred Options consultation, East Herts and Welwyn Hatfield Council Officers have undertaken technical assessments to assess the feasibility and suitability of development in this location. This is documented in the Settlement Appraisal.
- 13.1.4 Consequently, land to the East of Welwyn Garden City at Birchall Garden Suburb is allocated for development in both the East Herts District Plan, and the Welwyn Hatfield Local Plan to accommodate 2,550 new homes over the Plan period. 1,350 homes will be in East Herts and 1,200 homes will be in Welwyn Hatfield Borough.
- 13.1.5 As the development straddles the boundary between the two authorities the site will be planned in a comprehensive and co-ordinated manner. East Herts Council, Welwyn Hatfield Council and Hertfordshire County Council (in its capacity as minerals and waste planning, education and highways authority) will work together with landowners and other key stakeholders to produce a masterplan for Birchall Garden Suburb, which can be adopted as a Supplementary

Planning Document to provide a clear basis upon which future planning applications will be considered. The masterplan will set out the detailed phasing of delivery across the site, but development will commence within the first five years of the Plan period.

13.2 Development East of Welwyn Garden City

13.2.1 The main components of the development strategy for land to the East of Welwyn Garden City at Birchall Garden Suburb subject to masterplanning are expected to focus on the following:

13.2.2 **Housing and Community Facilities:** The development will comprise a mix of tenures, including affordable and aspirational homes as well as specialist residential provision for older people (such as retirement bungalows and apartments, flexi-care and residential care homes). In addition, a site will also be provided for Gypsies and Travellers. Development within the East Herts part of the site to the north of Birchall Lane will be a more compact urban form, while land to the south of Birchall Lane is likely to take the form of connected villages in order to fit well within the landscape.

13.2.3 The new homes will be supported by a range of community facilities located around two neighbourhood centres (one in East Herts and one in Welwyn Hatfield). The larger neighbourhood centre will be located to the north of Birchall Lane where access can be achieved from the main road. A smaller local centre will be located to the south of the site where it can be co-located with the primary school, thus creating a natural centre to the development.

13.2.4 **Education:** A two-form entry primary school with early years provision will be located within the Welwyn Hatfield part of the site, while an all through-school of six-forms of entry at secondary level and two forms of entry at primary level with early years provision will be located within the East Herts part of the site. Importantly, the through-school site will provide sufficient flexibility to accommodate up to eight forms of entry at secondary level and three forms of entry at primary level should future needs arise.

13.2.5 **Character and Design:** Welwyn Garden City is well known for its Garden City design principles and this will provide a strong

framework for the development, which will be secured through the use of design codes and a collaboratively prepared masterplan. This will ensure the highest quality design and layout and a comprehensive and unified approach to the whole development, albeit reflecting different character areas across the site. Connections will be enhanced between the development site to the environmental assets such as Panshanger Park and the River Lea and Mimram corridors.

- 13.2.6 **Heritage:** Important heritage assets within and in the vicinity of the site will be protected through adequate mitigation which will include maintaining open or landscaped areas where necessary. Land uses which can contribute towards maintaining these buffers will be located where required, such as locating the all through-school or public open space or sports pitches to the eastern edge of the site where the built form can provide a clear boundary, with the visually less intrusive features of the playing fields contributing to the softer edge of the development as well as a buffer between the development and heritage asset of Panshanger Park.
- 13.2.7 **Open Spaces:** Open spaces will be provided which provide multi-functional drainage solutions as well as space for recreation, creating connections to green infrastructure corridors including the Mimram and Lea Valleys. Formal open spaces will be provided through the creation of a large common/informal parkland utilising the former landfill part of the site within Welwyn Hatfield. The site will also make provision for playing pitches and play spaces as well as community orchards and allotments. Areas of ecological importance will be protected and enhanced through appropriate buffer planting and an appropriate land management strategy.
- 13.2.8 **Green Belt:** The site is largely screened from the wider landscape by the surrounding areas of woodland, which along with the surrounding roads help to define the structure of the area. Panshanger Lane to the east of the site provides a clear Green Belt boundary, beyond which is an area of high quality landscape around the Mimram Valley and the Grade II Registered Panshanger Park. To the south-east, the A414 makes a clear Green Belt boundary and will be screened by the creation of new landscape features.

- 13.2.9 **Transport:** An important aspect of the development will be its connectivity within the site and to the existing town. Walking and cycling and bus connectivity will be prioritised over car users to encourage a shift towards more sustainable means of transport. Existing Rights of Way will be enhanced, improving links within the site and to the countryside beyond. The development will make improvements to National Cycle Route 61 (a disused railway line known as the Cole Green Way), and will create new cycle networks providing connections within and around the site for leisure and commuter cycling trips to and from the development.
- 13.2.10 Existing bus routes will be extended into the site creating bus connectivity to Welwyn Garden City town centre and train station. Local education, health and retail opportunities will serve to make the development sustainable, reducing the need for travel as well as providing local job opportunities. This will have multiple benefits including contributing to the health and wellbeing of residents. The site is well located for access in to Welwyn Garden City off the A414 and B195. Mitigation will be required on the A414 junctions and improvements will be necessary to the B195, Birchall Lane.
- 13.2.11 **Employment:** New employment land has recently been granted permission by Welwyn Hatfield Council at the Holdings, Birchall Lane. The masterplan will seek to increase this employment land to the site currently occupied by BP Mitchell. Birchall Lane is a key route in to Welwyn Garden City from the east; therefore employment space will be highly visible and will contribute towards the creation of a new employment corridor. The area is well located for easy access to Hatfield Business Park and the employment opportunities within Welwyn Garden City and Hertford. There will also be employment opportunities within the two neighbourhood centres provided as part of the development and within the schools.
- 13.2.12 **Waste Water Infrastructure:** Waste water will drain to Rye Meads Waste Water Treatment Works, and new waste water services will be created as part of the development to ensure that the efficiency of the network is maintained and there are no adverse effects on surrounding watercourses.

13.2.13 **Minerals:** It is important to prevent the unnecessary sterilisation of mineral resources (which is a requirement of national policy and the Hertfordshire Minerals Local Plan). As there are underlying mineral deposits which will need to be extracted prior to the commencement of development, and if possible should be used locally in the construction phase. Detailed phasing and the approach to land remediation and subsequent development will be set out in the masterplan.

Policy EWEL1 Land East of Welwyn Garden City

I. Land at Birchall Garden Suburb is allocated for development in both the Welwyn Hatfield Local Plan (SDS2) and the East Herts District Plan (EWEL1), to accommodate approximately 2,550 new homes over the plan period, of which 1,200 will be in Welwyn Hatfield Borough and 1,350 in East Herts District.

II. East Herts District Council and Welwyn Hatfield Borough Council will continue to work together to ensure that the new suburb is delivered in a comprehensive manner across the local authority boundaries. Mechanisms will need to be established to ensure the effective delivery of infrastructure required to support the development.

III. A joint masterplan setting out the quantum and distribution of land uses, access, sustainable design and layout principles will be prepared by Welwyn Hatfield Borough Council and East Herts District Council, working with the landowner and other key stakeholders. The Masterplan, which will be informed by the Strategy Diagram shown in Figure 13.1 below, will form the basis of a Supplementary Planning Document which will provide further guidance on site specific matters. Any application for development should be preceded by, and consistent with, the Masterplan.

IV. The site will be planned comprehensively to create a new sustainable community incorporating Garden City principles.

V. The developer must demonstrate the extent of the mineral that may be present and the likelihood of prior extraction in an environmentally acceptable way has been fully considered. As a minimum, an assessment of the depth and quality of mineral, together with an appraisal of the consequential viability

for prior extraction without prejudicing the delivery of housing within the plan period should be provided.

VI. In accordance with the relevant Local/District Plan policies the site will provide:

- a) A wide mix of housing types, sizes and tenures, including affordable housing; housing for older people; and serviced plots of land to contribute towards meeting evidenced demand for self-build and custom housebuilding;
- b) A Gypsy and Traveller site of an area sufficient to accommodate a total of 15 pitches (4 pitches for East Herts' and 11 pitches for Welwyn Hatfield's needs) to contribute towards the needs of both authorities;
- c) A neighbourhood centre in the East Herts part of the development and a small neighbourhood centre in the Welwyn Hatfield part of the development, each in an accessible location to meet the day-to-day retail needs of new residents;
- d) An employment area in a visible and accessible location in accordance with an up-to-date assessment of need; this area would incorporate the Holdings in Welwyn Hatfield, together with land off Birchall Lane (currently allocated as a Waste Site (ref. AS008) in the Hertfordshire Waste Site Allocations Document) subject to there being no adverse impact on neighbouring residential amenity;
- e) Community facilities, including healthcare (in the East Herts part of the development) and leisure facilities;
- f) Education facilities, including one 2 form entry primary school with Early Years Provision in Welwyn Hatfield and an all-through school in East Herts comprising a 2 form entry primary school with Early Years Provision and a secondary school of up to 8 forms of entry. Schools should provide for the dual use of facilities for community purposes;
- g) Sustainable transport measures including the improvement of pedestrian links, cycle paths, passenger transport and community transport initiatives;

h) Suitable access arrangements and any necessary wider strategic and local highway mitigation measures, including addressing impacts on the A414 in Hertford, the B195 and the A1(M);

i) Formal and informal open spaces for leisure and recreation, including play areas, sports fields, allotments and community orchards. Spaces will contribute to wider ecological networks including a strategic green infrastructure corridor from St Albans through to Hertford. As such, spaces should:

- *be accessible to both new and existing communities;

- *provide north-south and east-west connections, providing upgraded routes for walkers and cyclists, including the Lea Valley Path and Cole Green Way;

- *provide safe routes for wildlife, protecting and enhancing wildlife assets;

- *balance the needs of recreation and nature, providing animal infrastructure and undisturbed areas.

j) Protection and enhancement of heritage assets and their settings, both on-site and in the wider area through appropriate mitigation measures;

k) Landscaping and planting;

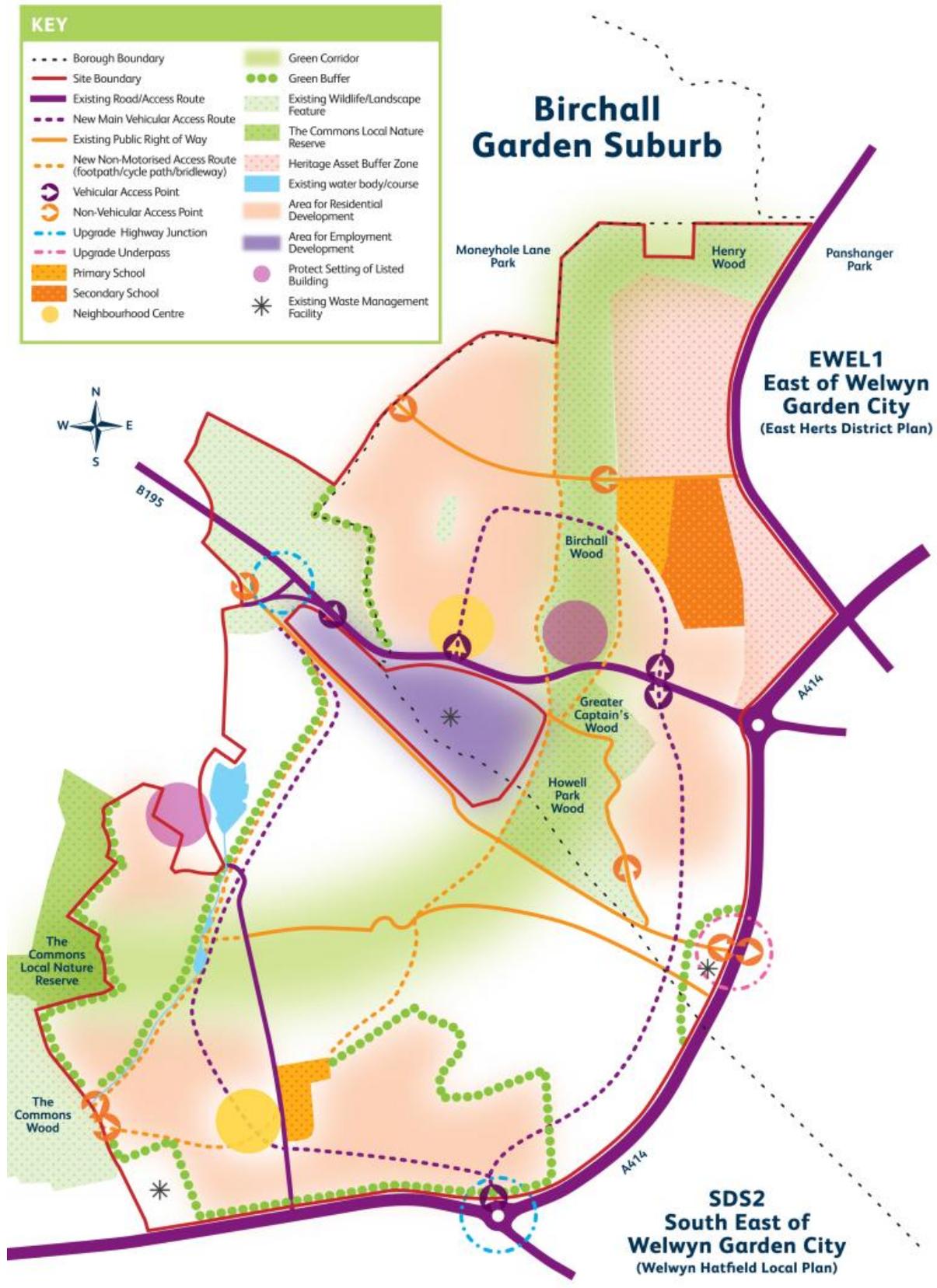
l) Necessary utilities, including integrated communications infrastructure to facilitate home-working; and

m) Sustainable drainage and provision for flood mitigation.

VI. In order to ensure that the site is planned and delivered comprehensively, any application for development on part of the site will be assessed against its contribution to the masterplan, and will not prejudice the implementation of the site as a whole.

13.2.14 Figure 13.1 is an illustrative strategy diagram which will be used as a basis for masterplanning and will also help inform decisions on planning applications.

Figure 13.1 Strategy Diagram - Land East of Welwyn Garden City



EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 25 AUGUST 2016

REPORT BY LEADER OF THE COUNCIL

EAST HERTS DRAFT DISTRICT PLAN – CHAPTER 13 – HOUSING:
RESPONSE TO ISSUES RAISED DURING PREFERRED OPTIONS
CONSULTATION AND DRAFT REVISED CHAPTER (RENUMBERED
CHAPER 14)

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

The purpose of this report is:

- To bring to Members' attention the issues raised through the Preferred Options consultation in connection with Chapter 13 (Housing) of the Draft District Plan Preferred Options version, together with Officer responses to those issues;
- To explain to Members why further amendments to Chapter 13 (Housing) are required to ensure that the final draft District Plan reflects the most up-to-date policy position and the latest available evidence;
- To place before Members for consideration a draft revised chapter (renumbered Chapter 14), for subsequent incorporation into the final draft District Plan.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:	
(A)	the issues raised in respect of Chapter 13 (Housing) of the Draft District Plan Preferred Options, as detailed at Essential Reference Paper 'B' to this report, be received and considered;
(B)	the Officer response to the issues referred to in (A) above, as detailed in Essential Reference Paper 'B' to this report, be agreed;

(C)	the further amendments in respect of Chapter 13 (Housing) of the Draft District Plan Preferred Options, as detailed at Essential Reference Paper ‘B’ to this report, be received and considered; and
(D)	the draft revised Chapter 14 (Housing), as detailed in Essential Reference Paper ‘C’ to this report, be agreed as a basis for inclusion in the final draft District Plan, with the content being finalised when the consolidated plan is presented in September 2016.

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.

1.2 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.

1.3 This report presents a draft revised chapter on Housing for subsequent incorporation into the final Draft District Plan. **Essential Reference Paper ‘B’** contains the Issues Report and **Essential Reference Paper ‘C’** the draft revised chapter.

2.0 Report

2.1 The Issue Report is split into two parts. The first part summarises the issues raised through the Preferred Options Consultation. The issues are grouped according to the section of the Draft Plan they relate to. The table presents an officer response to each issue and then sets out any subsequent 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 being proposed.

2.2 The second part of the Issue Report details any further amendments that are required to ensure that the final draft

District Plan reflects the most up-to-date policy position and the latest available evidence.

- 2.3 The Housing Chapter has been significantly amended from the version presented as part of the Preferred Options consultation in 2014. In addition to updated technical evidence being completed for the Council, numerous changes to various elements of Government guidance regarding housing policy have resulted in amendments to the chapter being necessary.
- 2.4 The key updated technical evidence based documents that have resulted in amendments being made to the Housing Chapter are the:
- West Essex and East Hertfordshire Strategic Housing Market Assessment (SHMA), September 2015
 - Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, April 2016
- 2.5 The key changes to Government guidance that have resulted in amendments being made to the Housing Chapter are set out in the:
- Housing and Planning Act 2016
 - Written Ministerial Statement introducing into national planning policy a threshold beneath which affordable housing contributions should not be sought, 28th November 2014
 - Planning Practice Guidance (PPG)
 - Written Ministerial Statement setting out the Government's national planning policy on the setting of technical standards for new dwellings, 25th March 2015
 - Self-Build and Custom Housebuilding Act 2015
 - Planning policy for traveller sites (PPTS), August 2015
- 2.6 The main amendments to the Housing Chapter resulting from the changes to Government guidance are summarised below. It should be noted that further amendments may be required to this chapter following publication of secondary legislation to support the primary legislation introduced through the Housing and Planning Act 2016. It is anticipated that this will be published later this year.

Affordable Housing

- 2.7 The Government published The Housing and Planning Act 2016 on 24th May 2016. The Act includes a new, broader definition of affordable homes to include starter homes, and the primary legislation for starter homes. It places a duty on the Council to promote the supply of starter homes in the District. Starter homes are defined as a new dwelling available for purchase by qualifying first-time buyers (aged 23-39), and are required to be marketed for sale at a price at least 20% less than open market value, subject to a price cap of £250,000. Re-sale values of starter homes will 'taper' back up to full open market value, with the full details to be confirmed by secondary legislation.
- 2.8 The exact proportion of starter homes required, and the size of qualifying sites upon which they must be delivered, will also be confirmed by secondary legislation. However, the Government has carried out consultation on the technical regulations required to support the delivery of starter homes and this consultation document indicated the intention for a minimum requirement of 20% of homes on sites of over 10 dwellings (or 0.5ha in size) to be provided as starter homes. Exceptions are anticipated to apply on grounds of viability and for certain types of sites and uses.
- 2.9 Therefore, the Council has had to amend the affordable housing policy to take account of the need to promote the supply of starter homes. The policy requires the tenure mix to be negotiated with the Council on a site by site basis, having regard to the affordable housing products defined within the National Planning Policy Framework. However, it should be noted that as the more detailed guidance regarding the delivery of starter homes is due to be brought forward through secondary legislation at a later date, further amendments may be required to Policy HOU3, prior to examination, to ensure that it is in accordance with the final starter homes regulations.
- 2.10 The Government have also introduced a threshold for seeking the provision of affordable housing into national planning policy, through a Written Ministerial Statement and amendments to the PPG. This threshold has been set at sites delivering 10 dwellings or less, and where the dwellings would have a combined gross floor space of less than 1,000 square metres. Therefore, Policy HOU3 has been amended so that the thresholds at which affordable housing is sought are in conformity with the PPG.

Housing for Older and Vulnerable People

- 2.11 The Written Ministerial Statement published on 25th March 2015 set out the Government's national planning policy on the setting of technical standards for new dwellings. These new standards replace the Lifetime Homes Standards, and set out how accessible and adaptable homes will be delivered. The Council is only able to specify housing standards provided in the 'New National Technical Standards', which provide specifications for accessible homes in three categories and have been added to Part M of the Building Regulations. The two higher tiers, Category 2 (equivalent to Lifetime Homes) and Category 3 (designed for wheelchair users) are optional standards and can only be secured through policies in Local Plans. Therefore, the Council has introduced a new policy HOU7 – Accessible and Adaptable Homes into the District Plan, which sets how the Council will seek delivery of dwellings that meet these specifications.
- 2.12 In addition, a specific target for the provision of bed-spaces within the Use Class C2 has been added to Policy HOU6 – Specialist Housing for Older and Vulnerable People, to reflect evidence contained in the latest SHMA. It is important to note that the objectively assessed housing need (OAN) for the District does not include the projected increase of the institutional population; therefore, this target of at least 530 bed-spaces to be provided between 2011-2033 is in addition to the overall housing requirement set out in the District Plan.

Self-Build and Custom Build Housing

- 2.13 A new policy, HOU8 – Self-Build Housing, regarding the provision of serviced plots for self-builders has been introduced into the Plan in response to The Self-Build and Custom Housebuilding Act 2015. The Act places a duty on the Council to keep and have regard to a register of people who are interested in self-build or custom-build projects in the District. In addition, the Housing and Planning Act 2016 requires the Council to grant sufficient permissions on serviced plots of land to meet demand in the District. Therefore, the Council is seeking a proportion of serviced dwelling plots be provided for sale to prospective self-builders on sites proposing over 200 dwellings. The Council will also be supportive of self-build projects identified within a Neighbourhood Plan, wherever possible.

Gypsies and Travellers and Travelling Showpeople

- 2.14 The section of the Plan relating to meeting the accommodation needs of Gypsies and Travellers and Travelling Showpeople was unable to be finalised for the Preferred Options consultation in 2014, due to the need to carry out an up to date Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment. This assessment was finalised in April 2016 and the policy has therefore been completed to identify deliverable sites to meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople throughout the Plan period.
- 2.15 In addition, the updated PPTS identifies a definition distinction that Gypsies and Travellers and Travelling Showpeople who no longer lead a nomadic lifestyle are treated as non-travelling Gypsies and Travellers and Travelling Showpeople for the purposes of the planning system. However, the Human Rights Act 1998 and the Equalities Act 2010 protect their cultural choice to live in mobile accommodation and therefore, there is a need to plan for the provision of park homes within the Plan.
- 2.16 Whilst the Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016, identified existing households that do not meet the PPTS definition, it did not identify the future requirement of those households up until 2033. Therefore, until the accommodation needs of these households are fully determined, a new policy, HOU10 New Park Home Sites for Non-Nomadic Gypsies and Travellers and Travelling Showpeople, has been introduced into the Plan which sets out the criteria which will be used to determine planning applications.

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:	Priority 1 – Improve the health and wellbeing of our communities Priority 2 – Enhance the quality of people's lives Priority 3 – Enable a flourishing local economy
Consultation:	The Report refers to the Draft District Plan consultation carried out between 27 th February and 22 nd May 2014.
Legal:	None
Financial:	None
Human Resource:	None
Risk Management:	None
Health and wellbeing – issues and impacts:	The 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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Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
General Issues				
13.1	13	Mark Prisk MP applauds the Authority's efforts in seeking to get the Local Plan in place, as soon as it is practical. Without a plan in place the district would be vulnerable to speculative and unsustainable development. There is, of course, a balance to be struck between a speedy process and proper consultation, but it's important that the adoption of a Local Plan is not delayed.	Support and comments noted and welcomed.	No amendment in response to this issue
13.2	13	No assessment has been made of empty and underused property in the district.	The Council is cognisant of paragraph 51 of the NPPF and is working with the owners of empty properties in the district. The Council has a dedicated Empty Homes Officer who is responsible for maximising the number of empty homes brought back into use in line with the Council's Empty Homes Strategy.	No amendment in response to this issue
13.3	13	Thames Water comment that the level of housing set out in the draft plan exceeds the current housing target for the district. Thames Water has been planning for a lower figure and accordingly capacity in the network will be used up at a quicker rate and delivery of any required upgrades will be required to be brought forward. The scale, nature and timing of delivery of any required infrastructure upgrades will be able to be determined once more detailed information on the scale,	Comments noted. The Council has engaged with Thames Water throughout the plan making process to ensure that the necessary wastewater infrastructure can be delivered.	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
		location and phasing of development is available.		
Type and Mix of Housing				
13.4	13.2	Support the thrust of Policy HOU1 which seeks to ensure the delivery of balanced communities	Support noted and welcomed.	No amendment in response to this issue
13.5	HOU1	Policy HOU1 is excessively prescriptive in that it expects all housing developments, irrespective of their location or nature, to deliver a mix of housing 'in accordance' with the latest SHMA. The policy wording should be revised so that housing developments, subject to site specific factors, deliver a mix of housing which 'reflects', 'is informed by' or 'is in line with' the latest evidence.	Agreed. The Policy wording has been amended.	Amendment to Policy HOU1, Part I: I. On new housing developments of 5 or more gross additional dwellings, an appropriate mix of housing tenures, types and sizes will be expected in order to create mixed and balanced communities appropriate to local character and in accordance with <u>taking account of</u> the latest Strategic Housing Market Assessment <u>and any additional up-to-date evidence</u> .
13.6	HOU1	Stevenage Borough Council supports HOU1. The plan should consider how the requirements in this policy relate to requirements in other authorities with whom housing market areas are shared. Stevenage, in common with many authorities in the south-east of England, experiences acute issues in relation to housing affordability and affordable housing need. As a predominantly planned New Town there are significant imbalances in the housing stock with a	Support and comments noted. It is Officer's view that a site for 600 homes should be allocated to the east of Stevenage. This site will be expected to provide an appropriate mix of housing in accordance with Policy HOU1.	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
		<p>shortage of both small units and larger family housing.</p> <p>Stevenage Council has previously sought to deliver a proportion of larger, 'aspirational' market homes in order to diversify the town's housing offer. East Herts should consider how any potential scheme to the east of Stevenage might contribute towards this.</p>		
13.7	HOU1	<p>Mark Prisk MP comments that the majority of the rise in population stems from people living longer. This is a welcome trend, but it has implications not just for the number of homes needed, but also the type.</p> <p>It is important that any Plan which is adopted sets out how enough of the right sorts of homes are being made available, and that the policies reflect the housing and associated needs of older people and their carers.</p>	<p>Comments noted and welcomed.</p> <p>Policy HOU6 Specialist Housing for Older and Vulnerable People and Policy HOU7 Accessible and Adaptable Dwellings seek the provision of homes suitable for older and vulnerable people.</p>	No amendment in response to this issue
13.8	HOU1	<p>The SHMA is an important document, but it is not clear how often it will be updated once the plan has been adopted or indeed what may replace it in terms of government advice. There should be some recognition that housebuilders also have experience and information to bring to an assessment of appropriate mix, which is often more immediate and alert to market</p>	<p>Agreed. The Policy wording has been amended to refer to 'additional up to date evidence'.</p>	<p>Amendment to Policy HOU1, Part I:</p> <p>I. On new housing developments of 5 or more gross additional dwellings, an appropriate mix of housing tenures, types and sizes will be expected in order to create mixed and balanced communities appropriate to local character and in accordance with <u>taking account of</u> the latest Strategic Housing Market Assessment <u>and any additional</u></p>

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
		changes than evidence in a SHMA.		<u>up-to-date evidence.</u>
13.9	HOU1	<p>(I) requires an appropriate mix of housing tenures, types and sizes to create mixed and balanced communities “<i>appropriate to local character and in accordance with the latest Strategic Housing Market Assessment.</i>”</p> <p>The principle behind the policy is not objected to but it is considered that its wording is contradictory as it implies the imposition of a mix from the SHMA which, in some circumstances may well conflict with local character. The policy should be amended to read “...<i>taking account of the latest Strategic Housing Market Assessment.</i>”</p>	Agreed. The Policy wording has been amended.	<p>Amendment to Policy HOU1, Part I:</p> <p><u>I.</u> On new housing developments of 5 or more gross additional dwellings, an appropriate mix of housing tenures, types and sizes will be expected in order to create mixed and balanced communities appropriate to local character and in accordance with <u>taking account of</u> the latest Strategic Housing Market Assessment <u>and any additional up-to-date evidence.</u></p>
13.10	HOU1	(II) requires affordable housing in accordance with Policy HOU3. The policy wording should reinforce the need to take account of viability.	Policy HOU3 Affordable Housing clearly takes account of viability. It is not considered necessary to repeat this in Policy HOU1.	No amendment in response to this issue
13.11	HOU1	The balance of housing needs to be addressed. Far too many flats are being built.	Comments noted. The latest SHMA (September 2015) shows that most of the market need is for housing (87%). The need for affordable housing is also predominantly for housing (70%).	No amendment in response to this issue
13.12	HOU1	This policy includes a requirement for at least 15% of all new dwellings to be constructed to ‘Lifetime Homes’ standards. The NPPF at paragraph 50	The Lifetime Homes Standard has been revoked through the Housing Standards Review and therefore all reference to Lifetime Homes has been deleted from the Plan. However, a requirement for	<p>Amendment to Policy HOU1, Part III:</p> <p>III. In order to encourage new homes that are readily adaptable to meet the changing needs of occupants, and to</p>

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
		refers to the need for LPA's to <i>'identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand'</i> . This could include the need to provide a proportion of lifetime homes within schemes. However there is no requirement for such needs to be specifically defined within development plan policy. Such needs will inevitably change throughout the lifetime of the plan and vary throughout the district and between the market and affordable sectors. Consequently specific standards in regard to lifetime home matters should not be included within the District Plan. Instead HOU1 should refer to the Council's evidence base.	the provision of accessible and adaptable dwellings to meet the changing needs of occupants over their lifetime has been included in the Plan (Policy HOU7). It is considered that it is necessary for such needs to be specifically defined within policy to ensure delivery.	<p>support independent living, at least 15% of all new dwellings are expected to be constructed to 'Lifetime Homes' standards.</p> <p><u>IV. Provision of accessible and adaptable dwellings to meet the changing needs of occupants over their lifetime, in accordance with Policy HOU7 (Accessible and Adaptable Homes).</u></p>
13.13	HOU1	The thrust of the draft Policy is supported, however, the expectation that all residential development proposals, irrespective of their location or nature, will be delivered "in accordance" with the latest SHMA is considered to be excessively prescriptive. It is recommended that this terminology is revised so that to require residential development proposals to 'reflect', 'be informed by' or 'be in line with' the indications set out in the latest evidence base, subject to site-specific factors.	Agreed. The Policy wording has been amended.	<p>Amendment to Policy HOU1, Part I:</p> <p>I. On new housing developments of 5 or more gross additional dwellings, an appropriate mix of housing tenures, types and sizes will be expected in order to create mixed and balanced communities appropriate to local character and in accordance with <u>taking account of</u> the latest Strategic Housing Market Assessment <u>and any additional up-to-date evidence.</u></p>

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
13.14	HOU1	The intention of the policy to secure a mix of dwelling types and tenures is supported, as is the absence of a specific dwelling mix. The content of Table 13.1 is likely to change over the plan period, such that residential developments will need to be assessed against the latest available information at the time of an application in order to inform the proposed mix of accommodation.	Comments noted and welcomed. Table 13.1 has been updated to reflect the evidence contained in the latest SHMA (September 2015). The Policy wording has also been amended to refer to 'additional up to date evidence'.	Amendment to Policy HOU1, Part I: <ol style="list-style-type: none"> <li data-bbox="2056 415 2736 814">I. On new housing developments of 5 or more gross additional dwellings, an appropriate mix of housing tenures, types and sizes will be expected in order to create mixed and balanced communities appropriate to local character and in accordance with <u>taking account of</u> the latest Strategic Housing Market Assessment <u>and any additional up-to-date evidence</u>.
13.15	HOU1	Policies HOU1, HOU2 and HOU3 deal with detailed planning considerations for housing proposals including type and mix, density and affordable housing. The Council must ensure that these policies are flexible to take account of changing market conditions over time (NPPF, paragraph 50) and to ensure plans are effective and deliverable (NPPF, paragraph 182). Such flexibility is therefore required in the housing policies to ensure the delivery of housing sites taking into consideration factors such as site constraints, environmental factors, viability and other policy considerations.	<p>Comments noted and welcomed.</p> <p>Policies HOU1 and HOU3 in particular have been updated to ensure that they are flexible enough to take account of changing market conditions over time.</p> <p>Policy HOU2 has been amended to allow for a more flexible approach which takes account of the character of the surrounding area.</p>	No amendment in response to this issue
Housing Density				

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
13.16	13.3.2	The use of the phrase 'may be appropriate' in the context of housing density leaves decisions up for interpretation. The Council should be clear as to what is and isn't expected.	The phrase is considered appropriate. Residential densities will vary dependent upon the local area context and character and the sustainability of the location.	No amendment in response to this issue
13.17	HOU2	Policy should steer developers in much finer detail of provision, beyond the cross references to other policies in (a) to (d).	The policy wording is considered appropriate. Residential densities will vary dependent upon the local area context and character and the sustainability of the location.	No amendment in response to this issue
13.18	HOU2	Density is an important consideration in all developments. There must be due consideration given to the amount of green space allocated to each dwelling. The current trend for 'postage stamp' sized gardens does not accommodate children, or the need for humans to have their own green space. Sufficient garden space must be included in the density of all schemes.	Comments noted. The design and layout of development is addressed in Chapter 16: Design & Landscape (Policy DES3 Design of Development).	No amendment in response to this issue
13.19	HOU2	Support for new development being informed by the character of the local area. The policy should include a requirement for private amenity space of sufficient square metres, not small token gestures.	Support and comments noted. The design and layout of development is addressed in Chapter 16: Design & Landscape (Policy DES3 Design of Development).	No amendment in response to this issue
13.20	HOU2	The need for HOU2 is questioned. Support for the principle of making efficient use of land; however, this is an objective of the NPPF and does not need to be restated here. Other policies of the Plan give guidance on design,	Comments noted. However, the NPPF states that local planning authorities should set out their approach to housing density. Policy HOU2 does this.	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
		mix, open space and green infrastructure so there is no need to repeat the objectives of these policies. Moreover, the reference to average net densities (above and below 30pdh) in different locations is entirely unnecessary. Housing should be well designed taking account of local character and the resulting density will therefore vary on this basis.		
13.21	HOU2	Policy HOU2 is supported, in particular its expectation that densities of circa 30 dwellings per hectare will normally be appropriate for sites that are in peripheral locations within and on the edge of settlements.	Support noted and welcomed.	No amendment in response to this issue
13.22	HOU2	Common sense dictates that there must be a difference in housing density between urban areas and rural villages.	Comment noted. This is what Policy HOU2 seeks to achieve.	No amendment in response to this issue
13.23	HOU2	The housing densities set out in Policy HOU2 are supported	Support noted and welcomed.	No amendment in response to this issue
13.24	HOU2	Policies HOU1, HOU2 and HOU3 deal with detailed planning considerations for housing proposals including type and mix, density and affordable housing. The Council must ensure that these policies are flexible to take account of changing market conditions over time (NPPF, paragraph 50) and to ensure plans are effective and deliverable (NPPF, paragraph 182). Such flexibility is therefore required in the housing policies to ensure the delivery of	Comments noted and welcomed. Policies HOU1 and HOU3 in particular have been updated to ensure that they are flexible enough to take account of changing market conditions over time. Policy HOU2 has been amended to allow for a more flexible approach which takes account of the character of the surrounding area.	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
		housing sites taking into consideration factors such as site constraints, environmental factors, viability and other policy considerations.		
Affordability and the Housing Market				
13.25	13.4	The Council should ensure that the required amount of affordable housing is provided on all sites, rather than seeking a target of 'up to'.	A target of 'up to' is considered appropriate and does not diminish the Council's ability to achieve its objectives. Applicants seeking to justify a lower percentage level are required to demonstrate why it is not economically viable to provide affordable housing in accordance with the policy.	No amendment in response to this issue
13.26	13.4	The concept of affordable housing needs to be modified. It is currently associated with people reliant on the welfare state, whereas in East Herts the need for affordable housing is relevant to a much wider range of workers and families than welfare needs would address due to the high cost of renting and buying housing. The Plan should identify the need for this higher tier of 'affordable housing' and require a proportion of new housing development to meet this need.	Comment noted. The NPPF currently defines affordable housing as 'social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market'. In addition, the Government has signalled its intention to amend the definition of affordable housing to include 'starter homes' which are new homes available to first term buyers aged under 40, at a discount of at least 20% off the open market price. Therefore, it does not necessarily mean that people who require affordable housing are reliant on the welfare state. Intermediate housing products, such as shared equity, are designed for households who are able to afford housing at a cost above that of social or affordable rent. The latest SHMA (September 2015) states that the need for rented affordable housing in East Herts is 84% and the need for intermediate affordable housing is 16%. Policy HOU3 seeks to provide a mix of affordable housing tenures to address this need.	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
13.27	13.4.14	Text should acknowledge that in the case of blocks of flats, it is acceptable for dwellings accessed from a single access core to be either affordable rental units, or affordable shared ownership with or without market units, and that pepper-potting does not require these two tenure groups to be mixed on one core.	The Council works closely with Registered Providers to ensure that schemes of mixed tenure are successful. The text acknowledges that site specific considerations may prevent the 'pepper-potting' of affordable housing across a site. Further guidance on 'pepper-potting' is set out in the Council's 'Affordable Housing and Lifetime Homes' (2008) Supplementary Planning Document. It is the Council's intention to update this SPD shortly.	No amendment in response to this issue
13.28	13.4.14	Text should acknowledge that the distribution of affordable dwellings through a development can be in clusters.	Agreed. The text has been amended by the insertion of 'in clusters appropriate to the size and scale of the development'. Further guidance on 'pepper-potting' is set out in the Council's 'Affordable Housing and Lifetime Homes' (2008) Supplementary Planning Document. It is the Council's intention to update this SPD shortly.	<p>Amendment to text (para 13.4.14 renumbered 13.4.16)</p> <p><u>13.4.16</u> In general affordable housing should be provided on the application site. Wherever possible, the affordable houses should be integrated within the scheme through 'pepper-potting' rather than concentrated in a particular area unless site specific considerations dictate otherwise. This does not necessarily mean that every second or third property should be affordable; rather the affordable housing should be distributed evenly across the entire site, as this ensures the best prospect of securing mixed, inclusive communities. The design and appearance of affordable housing should be indistinguishable from market units. Further guidance on 'pepper-potting' and the Council's approach to affordable housing is set out in the Council's 'Affordable Housing and Lifetime Homes' (2008) Supplementary Planning Document</p> <p><u>across the entire site in clusters appropriate to the size and scale of the development</u></p>

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
				(or as amended).
13.29	HOU3	<p>Stevenage Borough Council generally supports the tiered approach to affordable housing provision which takes account of viability.</p> <p>Stevenage, in common with many authorities in the south-east of England, experiences acute issues in relation to housing affordability and affordable housing need. If East Hertfordshire is minded to consider the possibility of development to the east of Stevenage, they would like to discuss the possibility of shared nomination rights to any affordable homes built there.</p>	<p>Support noted.</p> <p>Nominations to affordable homes provided in East Herts would be allocated through the East Herts Housing Register.</p>	No amendment in response to this issue
13.30	HOU3	<p>'Up to' 30% or 40% should read 'no less than'. The present wording sets 30% and 40% as maxima so that a Housing Association development of 100% affordable housing would be in breach of policy. Clearly that is not the intention. On the other hand a proposal for 10% would comply with a policy seeking a maximum of 40%, which is not the intention either. The evidence shows a very great need for affordable housing, and the policy should make it clear that at least the specified percentages are expected, unless an applicant seeks a dispensation under (IV).</p>	<p>First, the policy 'expects' a provision of 'up to' 30% or 40% according to site size. The word 'expects' would not render a scheme for over those percentages (for example made by a Housing Association) contrary to the policy, in that whilst it is not expected, it is not precluded; Second, if a viability appraisal demonstrates that 10% is the maximum provision viable in a particular scheme on a particular site at a particular time, clearly the policy is intended to allow such a provision, hence (III) and (IV) are appropriately worded.</p> <p>Disagree that the provision of affordable housing should always be rounded up if the relevant percentage results in less than .5 of a dwelling in the resultant figure. It is quite reasonable for the</p>	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
		To avoid any dispute when applying the various percentages to small schemes, the policy should state that the number of dwellings required to be affordable, rented, or intermediate should be rounded up to the nearest whole number.	normal convention on rounding to apply in these calculations, since otherwise the percentage provision could be over the 30% or 40% expected.	
13.31	HOU3	<p>Mark Prisk MP comments that East Herts is an expensive area to live in. The Plan's policies for enabling more affordable homes to be built are welcomed, but careful attention is needed both to the total number of affordable homes and their distribution. This means ensuring that affordable homes are developed in each town, but also in villages, especially Group One villages, where there is a need.</p> <p>The MP is also concerned to ensure that the Plan's policies seek to secure mixed developments, by tenure and by price. Single tenure developments which seek to lump lower-cost homes together, will only result in social problems later on. Mixed development should be the clear preference in the Plan's policies.</p>	<p>Comments noted and welcomed. Policy HOU3 seeks affordable housing provision on all sites proposing development of 11 or more gross additional dwellings, both in the towns and villages.</p> <p>Paragraph 13.4.16 states that affordable housing should be integrated within a scheme through 'pepper-potting', as this ensures the best prospect of securing mixed, inclusive communities.</p>	No amendment in response to this issue
13.32	HOU3	The affordable housing tenure splits proposed by HOU3 are contrary to the evidence base. The SHMA identified a need for a mix of 66% intermediate/ shared ownership and 34% social/affordable rented across all sites.	Comments noted. The latest SHMA (September 2015) states that the need for rented affordable housing in East Herts is 84% and the need for intermediate affordable housing is 16%. Table 13.3 has been inserted into the Plan and this sets out the evidence on the affordable housing mix	<p>Amendment to Policy HOU3, Part II:</p> <p>ii. In order to continue creating mixed and balanced communities, Affordable Housing will be expected to be provided on the following tenure mix basis on</p>

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
		<p>Whilst the larger site requirement is broadly in line with the need demonstrated by the evidence base, the small site balance is not.</p> <p>The justification provided is that a greater level of rented accommodation will ensure that those in greatest need will be given priority. Whilst it is acknowledged that this may provide some justification to modify the split, it is not enough to simply assume that the current requirement contained in the 2007 Local Plan is correct for the new Plan period.</p> <p>Paragraph 158 of the NPPF requires the Local Plans to be based on “adequate, <i>up-to-date and relevant evidence</i>”. Specifically in relation to housing, paragraph 159 requires local authorities to prepare a SHMA which should identify the scale, mix and range of tenures.</p>	<p>requirement.</p> <p>Notwithstanding this, the tenure split in Policy HOU3 has been removed due to the requirement for the Council to promote the delivery of starter homes. In addition paragraph 13.4.9 has been deleted.</p>	<p><u>sites proposing:</u></p> <p>(a) 5 to 199 gross additional dwellings: 75% social/affordable rented and 25% intermediate/shared ownership</p> <p>(b) 200 or more gross additional dwelling: 60% social/affordable rented and 40% intermediate/shared ownership</p> <p>II. <u>Affordable Housing provision will be expected to incorporate a mix of tenures taking account of the Council's most up to date evidence on housing need. The Council will negotiate the tenure mix to be provided on a site, having regard to the affordable housing products defined within the National Planning Policy Framework, through the planning application process.</u></p>

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
13.33	HOU3	<p>(l) refers to a threshold of 5 or more gross additional dwellings as the trigger for provision of affordable housing.</p> <p>The Government's Autumn Statement 2013 included a commitment to consult on a proposed new 10-unit threshold for section 106 affordable housing contributions. The subsequent Planning Performance and Planning Contributions Consultation dated March 2014 sets out this policy intention. East Herts should review this threshold in light of emerging Government policy.</p>	<p>Comment noted. This has been an evolving position over recent months, with the original Written Ministerial Statement and subsequent amendment to Planning Practice Guidance being challenged through the courts.</p> <p>The position has now been clarified and the Planning Practice Guidance states that affordable housing contributions should not be sought from sites proposing development of 10 units or less. Therefore the threshold at which affordable housing will be sought has been amended in Policy HOU3.</p> <p>In addition paragraph 13.4.12 (now 13.4.4) in the supporting text has been updated.</p>	<p>Amendment to Policy HOU3, Part I (a):</p> <p>(ab) up to 305⁵% on sites proposing 5¹¹ to 14 gross additional dwellings, or between 0.17 and 0.49 hectares in size;</p> <p>Amendment to text (para 13.4.12 renumbered 13.4.4)</p> <p><u>13.4.4 In order to deliver the identified need, Policy HOU3 requires the following:</u></p> <p><u>(a) up to 35% affordable housing on sites proposing 11 to 14 gross additional dwellings;</u></p> <p><u>(b) up to 40% affordable housing on sites proposing 15 or more gross additional dwellings.</u></p>
13.34	HOU3	Most local planning authorities use net provision rather than gross to calculate thresholds.	The Policy reflects the Council's Affordable Housing & Lifetime Homes SPD which states that where a development is facilitated by the demolition of an existing dwelling or dwellings, or a building that was previously in residential use, in considering whether a development meets the threshold for providing affordable housing, the gross number of dwellings, not the net increase, will be considered.	No amendment in response to this issue
13.35	HOU3	Thorley Parish Council objects to HOU3. Social justice would seem to demand that if a number of people who have an affordable need can't live here then a similar number in the market sector	Not agreed. Planning Practice Guidance identifies that Councils should consider 'an increase in the total housing figure' where this could 'help deliver the required number of affordable homes'. It does not advocate reducing the overall housing	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
		should not be able to either. We suggest a reduction of between 10% and 20% of the headline figure of the total houses would be fair. Thus between 1,500 and 3,000 houses should be removed from consideration.	requirement which would result in a reduced number of affordable dwellings being delivered.	
13.36	HOU3	Buntingford Town Council, Buckland and Chipping Parish Council and others consider that the Affordable Housing percentages should be decided on a town by town, village by village, or site by site basis, based on identified local need and in areas where there is sufficient employment. Not just a quota of up to 40% across East Herts.	Not agreed. The SHMA identifies a significant need for affordable housing across the district and therefore it is important to maximise the amount of affordable housing that can be delivered through market housing led developments. Meeting affordable housing needs is a key element of the social element of sustainable development, and maximising the provision of affordable housing is identified within the Council's Corporate Strategic Plan.	No amendment in response to this issue
13.37	HOU3	The level of affordable housing proposed in policy HOU3 fails to take full account of viability and could hold back the delivery of much needed housing. Although (III) allows for a lower provision to be permitted if it can be shown that 30 or 40% cannot be delivered for viability reasons, the starting point of the policy must be a level of provision which is generally achievable across the district.	<p>The Delivery Study confirms the level of affordable housing that has been assessed as being viable (35% on sites proposing 5-14 dwellings; and 40% on sites proposing 15 or more dwellings) for most developments, in most locations across the district.</p> <p>It is acknowledged that there will be certain sites where this level of affordable housing provision is not viable. Part III of Policy HOU3 allows for a lower level of affordable housing to be provided in these circumstances.</p>	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
13.38	HOU3	(II) requires more social rented on smaller schemes (75/25) and less on schemes over 200 dwellings (60/40). There is no justification for this difference, with a threshold of 200 units being arbitrary. The comment that affordable housing tenures on larger sites “should reflect a more balanced mix” seems unjustified; there should be a balanced mix on all sites. The Policy should be amended to state that a mix of 60/40 social rented/intermediate <i>will be encouraged</i> on all sites. This will allow flexibility and ensure an appropriate mix to be determined on a site by site basis.	<p>Comment noted. The latest SHMA (September 2015) states that the need for rented affordable housing in East Herts is 84% and the need for intermediate affordable housing is 16%. Table 13.3 has been inserted into the Plan and this sets out the evidence on the affordable housing mix requirement. Given the demonstrable need for affordable rented housing, it is considered appropriate to continue to give priority to this tenure over intermediate housing.</p> <p>Notwithstanding this, the tenure split in Policy HOU3 has been removed due to the requirement for the Council to promote the delivery of starter homes. The size of the site will no longer affect the tenure mix sought. In addition paragraph 13.4.9 has been deleted.</p>	<p>Amendment to Policy HOU3, Part II:</p> <p>II. In order to continue creating mixed and balanced communities, Affordable Housing will be expected to be provided on the following tenure mix basis on sites proposing:</p> <p>(a) 5 to 199 gross additional dwellings: 75% social/affordable rented and 25% intermediate/shared ownership</p> <p>(b) 200 or more gross additional dwelling: 60% social/affordable rented and 40% intermediate/shared ownership</p> <p><u>II. Affordable Housing provision will be expected to incorporate a mix of tenures taking account of the Council's most up to date evidence on housing need. The Council will negotiate the tenure mix to be provided on a site, having regard to the affordable housing products defined within the National Planning Policy Framework, through the planning application process.</u></p>
13.39	HOU3	(VI) states that affordable housing should be “ <i>integrated into the open market housing</i> development using appropriate design methods, i.e. tenure blind.”	<p>Not agreed. The term ‘pepper-potting’ is an established term in housing policy and is considered an effective planning tool in the delivery of mixed, inclusive communities.</p> <p>However, for clarity, and acknowledging Registered</p>	<p>Amendment to text (para 13.4.14 renumbered 13.4.16)</p> <p>13.4.16 In general affordable housing should be provided on the application site.</p> <p>Wherever possible, the affordable houses</p>

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
		<p>This approach is supported, however, it is noted that the supporting justification at paragraph 13.4.14 states that affordable housing should be integrated into the scheme “through pepper-potting rather than concentrated in a particular area unless site specific considerations dictate otherwise...affordable housing should be spread evenly across the entire site...”</p> <p>Objection to the use of the phrase ‘pepper potting.’ It is unrealistic to spread affordable housing ‘evenly’ as this makes proper management by Registered Providers impossible. Indeed, if, as required by the policy, the housing is tenure blind, the distribution becomes largely irrelevant.</p>	<p>Providers requirements for managing affordable housing, the text of paragraph 13.4.14 (renumbered 13.4.16) has been amended.</p> <p>Further guidance on ‘pepper-potting’ is set out in the Council’s ‘Affordable Housing and Lifetime Homes’ (2008) Supplementary Planning Document. It is the Council’s intention to update this SPD shortly.</p>	<p>should be integrated within the scheme through ‘pepper-potting’ rather than concentrated in a particular area unless site specific considerations dictate otherwise. This does not necessarily mean that every second or third property should be affordable; rather the affordable housing should be distributed <u>across the entire site in clusters appropriate to the size and scale of the development</u> evenly across the entire site, as this ensures the best prospect of securing mixed, inclusive communities. The design and appearance of affordable housing should be indistinguishable from market units. Further guidance on ‘pepper-potting’ and the Council’s approach to affordable housing is set out in the Council’s ‘Affordable Housing and Lifetime Homes’ (2008) Supplementary Planning Document (or as amended).</p>
13.40	HOU3	<p>Part II of the policy sets a fixed tenure split for the provision of affordable housing. The expectation that all residential development proposals, irrespective of their location or nature, will deliver such a split to be excessively prescriptive. It is recommended that the terminology is revised so that the draft Policy requires residential development proposals to ‘reflect’, ‘be informed by’ or ‘be in line with’ the indications set out in the latest evidence base, subject to site-specific factors.</p>	<p>Comment noted. The latest SHMA (September 2015) states that the need for rented affordable housing in East Herts is 84% and the need for intermediate affordable housing is 16%. Table 13.3 has been inserted into the Plan and this sets out the evidence on the affordable housing mix requirement.</p> <p>Notwithstanding this, the tenure split in Policy HOU3 has been removed due to the requirement for the Council to promote the delivery of starter homes. The tenure split for affordable housing will be negotiated with the Council on a site by site</p>	<p>Amendment to Policy HOU3, Part II:</p> <p>II. In order to continue creating mixed and balanced communities, Affordable Housing will be expected to be provided on the following tenure mix basis on sites proposing:</p> <p>(a) 5 to 199 gross additional dwellings: 75% social/affordable rented and 25% intermediate/shared ownership</p> <p>(b) 200 or more gross additional dwelling:</p>

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
			basis.	<p>60% social/affordable rented and 40% intermediate/shared ownership</p> <p><u>II.Affordable Housing provision will be expected to incorporate a mix of tenures taking account of the Council's most up to date evidence on housing need. The Council will negotiate the tenure mix to be provided on a site, having regard to the affordable housing products defined within the National Planning Policy Framework, through the planning application process.</u></p>
13.41	HOU3	To encourage local people to stay in the local area there needs to be far more affordable housing. There should be a second tier of "affordable housing" that provides opportunities for local people who could fund a home but not in competition with the high prices that are market driven. This might be achieved using schemes such shared ownership, co-operative housing or housing association. These houses would need to remain in a separate and not be eligible for sale into the free market. Criteria would need to be applied to encourage local people to stay in the area. This needs to be balanced with other affordable housing that will be open to all.	<p>Comment noted. The NPPF currently defines affordable housing as 'social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market'. In addition, the Government has signalled its intention to amend the definition of affordable housing to include 'starter homes' which are new homes available to first term buyers aged under 40, at a discount of at least 20% off the open market price.</p> <p>Intermediate housing products, such as shared equity, are designed for households who are able to afford housing at a cost above that of social or affordable rent. The latest SHMA (September 2015) states that the need for rented affordable housing in East Herts is 84% and the need for intermediate affordable housing is 16%. Policy HOU3 seeks to provide a mix of affordable housing tenures to</p>	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
			<p>address this need.</p> <p>Some forms of affordable intermediate housing are subject to a local connection test, whilst others, including starter homes, are available for anyone to buy.</p> <p>In addition, most forms of shared ownership properties are designed so that the owner can staircase up to full ownership. However, Policy HOU3 requires that any subsidy will be recycled for alternative affordable housing provision.</p>	
13.42	HOU3	<p>Policy should adhere more closely to the evidence in the Viability Assessment. This will help in assisting the delivery of housing and rectifying the problems already highlighted by the Council with regards to the deliverability larger sites, and the added infrastructure costs associated with them.</p>	<p>Comment noted. The Delivery Study confirms the level of affordable housing that has been assessed as being viable (35% on sites proposing 5-14 dwellings; and 40% on sites proposing 15 or more dwellings) for most developments, in most locations across the district.</p> <p>It is acknowledged that there will be certain sites where this level of affordable housing provision is not viable, and the Delivery Study confirms that policy trade-off decisions may be required between the need to deliver infrastructure to support the delivery of growth and meeting the affordable housing need. Part III of Policy HOU3 allows for a lower level of affordable housing to be provided in these circumstances.</p>	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
13.43	HOU3	<p>The Council is currently relying on a SHMA that was published in 2010. Given the recent change in market conditions and the volatile nature of the area, this document is out of date. The council should ensure that any update to the SHMA is in accordance with the NPPF to guarantee that the Local Plan document is seen to be robust.</p>	<p>Comment noted. An updated SHMA has been produced on behalf of the local authorities of West Essex (Epping Forest, Harlow and Uttlesford) and East Herts. The SHMA meets the requirements of the NPPF and PPG and reflects emerging good practice, including advice from the Planning Advisory Service (PAS). The 2015 SHMA replaces the SHMA Update 2012 (published in March 2013).</p>	<p>No amendment in response to this issue</p>
13.44	HOU3	<p>(l) requires on-site affordable housing provision of “up to 30% on sites proposing 5 to 14 gross additional dwellings, or between 0.17ha and 0.49ha in size” or “up to 40% on sites proposing 15 or more gross additional dwellings, or 0.5 hectares or more in size”. This is an arbitrary distinction and one that is not underpinned by the Council’s evidence base set out in the Viability Assessment 2010.</p> <p>While Criterion III states that “Lower provision may be permitted if it is demonstrated that the 30% and 40%...cannot be achieved due to viability reasons or where it would prejudice the need to secure other infrastructure priorities”, in the absence of any compelling evidence to justify the Council’s approach, it would be more appropriate to apply the same affordable housing requirement across all schemes of 5 or more dwellings as the starting</p>	<p>The Delivery Study confirms the level of affordable housing that has been assessed as being viable (35% on sites proposing 5-14 dwellings; and 40% on sites proposing 15 or more dwellings) for most developments, in most locations across the district.</p> <p>Notwithstanding this, the threshold at which an affordable housing requirement will be sought from development schemes has been amended in Policy HOU3, to ensure that it is in accordance with the Planning Practice Guidance which states that affordable housing contributions should not be sought from sites proposing development of 10 units or less.</p>	<p>No amendment in response to this issue</p>

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
		point for negotiation.		
13.45	HOU3	The inclusion of viability measures within the policy is supported, as it is vital that developers have sufficient <i>flexibility</i> to adapt to changing economic circumstances over the <i>plan</i> period. Policy should, however, recognise that it may not always be feasible to distribute affordable housing units amongst market housing units, as this can create difficulties in relation to the management and servicing of these units by Registered Social Landlords.	<p>Comments noted and welcomed.</p> <p>The ‘pepper-potting’ of affordable housing across a development site is considered to be crucial to the delivery of mixed, inclusive communities. However, for clarity, and acknowledging Registered Providers requirements for managing affordable housing, the text of paragraph 13.4.14 (renumbered 13.4.16) has been amended.</p> <p>Further guidance on ‘pepper-potting’ is set out in the Council’s ‘Affordable Housing and Lifetime Homes’ (2008) Supplementary Planning Document. It is the Council’s intention to update this SPD shortly.</p>	<p>Amendment to text (para 13.4.14 renumbered 13.4.16)</p> <p>13.4.16 In general affordable housing should be provided on the application site. Wherever possible, the affordable houses should be integrated within the scheme through ‘pepper-potting’ rather than concentrated in a particular area unless site specific considerations dictate otherwise. This does not necessarily mean that every second or third property should be affordable; rather the affordable housing should be distributed <u>across the entire site in clusters appropriate to the size and scale of the development</u> evenly across the entire site, as this ensures the best prospect of securing mixed, inclusive communities. The design and appearance of affordable housing should be indistinguishable from market units. Further guidance on ‘pepper-potting’ and the Council’s approach to affordable housing is set out in the Council’s ‘Affordable Housing and Lifetime Homes’ (2008) Supplementary Planning Document (or as amended).</p>
13.46	HOU3	The Council should ensure its affordable housing requirements are based on robust evidence, taking account of up-to-date information on viability. Based on the affordable housing needs identified by the authority’s 2013 SHMA,	Comments noted. The Delivery Study confirms the level of affordable housing that has been assessed as being viable (35% on sites proposing 5-14 dwellings; and 40% on sites proposing 15 or more dwellings) for most developments, in most locations	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
		an increase in the overall housing requirements for the district will be needed, given the likely delivery of affordable housing as a percentage of market-led housing developments.	across the district. The issue of addressing affordable housing need has been addressed in the SHMA as part of calculating an overall objectively assessed housing need (OAN) for the district. The updated SHMA (September 2015) sets out the district's affordable housing need, as being 31% of overall housing need. The requirements set out in Policy HOU3 aim to address this identified need.	
13.47	HOU3	It is acknowledged that the provision of affordable housing on-site as part of new residential development is preferable from the Council's perspective and it is considered to be reasonable to only allow off-site provision in exceptional circumstances. However, HOU3 might provide further explanation of the exceptional circumstances that would permit affordable housing being provided off-site, whether that be on the basis of viability, practicality or accessibility to local services and amenities etc.	Not agreed. Off-site provision of affordable housing will only be permitted in exceptional circumstances. These will be judged on a site-by-site basis and therefore it is not considered necessary to provide examples, as the circumstances of each site would be different.	No amendment in response to this issue
13.48	HOU3	HOU3 would benefit from greater clarity as to the process that will be entered into in order to calculate the financial contribution which may, where justified, be paid in lieu of on-site affordable housing. If a formula based calculation is to be used, this could be provided within the policy.	Not agreed. Off-site provision of affordable housing will only be permitted in exceptional circumstances, and it is not considered necessary to have a formula based calculation within the policy wording. Further guidance on 'off-site provision' is set out in the Council's 'Affordable Housing and Lifetime Homes' (2008) Supplementary Planning Document. It is the Council's intention to update this SPD	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
			shortly.	
13.49	HOU3	It is worth emphasising that affordable housing tends to yield more children requiring school places than open market housing. That being the case, and as required by paras 70 and 72 of the NPPF, the LPA must ensure that schools are capable of being expanded to meet the demands placed on them. They should also ensure that appropriate mechanisms are in place to secure funding, and policies in place to deliver the physical expansions of the schools. This applies to both primary and secondary education.	Comment noted. The Council has worked closely with Hertfordshire County Council, as the local authority with responsibility for education, to ensure that appropriate mechanisms are in place to ensure that education needs are met either through expansion or through the provision of new schools.	No amendment in response to this issue
13.50	HOU3	Policies HOU1, HOU2 and HOU3 deal with detailed planning considerations for housing proposals including type and mix, density and affordable housing. The Council must ensure that these policies are flexible to take account of changing market conditions over time (NPPF, paragraph 50) and to ensure plans are effective and deliverable (NPPF, paragraph 182). Such flexibility is therefore required in the housing policies to ensure the delivery of housing sites taking into consideration factors such as site constraints, environmental factors, viability and other policy considerations.	Comments noted and welcomed. Policies HOU1 and HOU3 in particular have been updated to ensure that they are flexible enough to take account of changing market conditions over time.	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
Special Residential Uses				
13.51	13.5.1	As this section refers to mobile homes, reference should also be made to the Caravan Sites Acts regarding the detailed administration of such developments.	Not agreed. It is not considered necessary to refer to the Caravan Sites Acts.	No amendment in response to this issue
Rural Exception Sites				
13.52	13.6.4	To be financially viable some rural exception sites would need to include market housing to subsidise the provision of affordable housing.	Comment noted. In accordance with paragraph 54 of the NPPF, the text and policy has been amended to reflect the fact that allowing some market housing could facilitate the provision of additional affordable housing to meet local needs.	<p>Amendment to text (new paragraph 13.6.4)</p> <p><u>13.6.4 While the whole of a rural exception scheme is normally expected to deliver 100% affordable housing, a small number of market homes may be permitted at the Council's discretion, where a viability assessment demonstrates that a cross subsidy is necessary to make the scheme viable. Any market housing will be expected to meet identified local housing needs.</u></p> <p>Amendment to Policy HOU4, Part III:</p> <p>II. <u>A small number of market homes may be permitted, at the Council's discretion, where a viability assessment demonstrates that a cross subsidy is necessary to make the scheme viable. Any market housing provided will be expected to meet identified local housing needs.</u></p> <p>III. Where permission is granted this will be subject to planning obligations and will include safeguards that the scheme</p>

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
				provides for the identified local affordable housing need and will continue to do so in perpetuity.
13.53	HOU4	Datchworth Parish Council supports the principle of policy HOU4 (III) but urge that it is made clearer that the definition of local need in perpetuity means for people with strong connections by residency or family history with the area (village or immediate surroundings) where the development is to take place and the village it is designed to benefit.	Support noted and welcomed. Further guidance on Rural Exceptions Sites, including eligibility criteria, will be set out in the updated Affordable Housing Supplementary Planning Document (SPD).	No amendment in response to this issue
Dwellings for Rural Workers				
13.54	13.7.4	Any conditions imposed should include a specific timescale, after which a review should be undertaken to determine whether the need still exists.	Comment noted. Part IV of the policy states the exceptional circumstances which would need to be demonstrated to permit the removal of an occupancy condition related to rural workers.	No amendment in response to this issue
13.55	HOU5	Part (III) should include widows, widowers and dependants of people employed in rural pursuits, as well as retirees.	Agreed. The Policy wording has been amended.	Amendment to Policy HOU5, Part III: III. Where a new dwelling is permitted, the occupancy will be restricted by condition to ensure that it is occupied by a person or persons currently employed, <u>or last employed</u> , in agriculture, forestry or other rural business, <u>or a widow or widower of such a person, and to any residents dependants</u> .
13.56	HOU5	Policy supported by Great Munden Parish Council.	Support noted and welcomed	No amendment in response to this issue
13.57	HOU5	Objection to policy in its current form	Disagree. It is considered appropriate to maintain	No amendment in response to this issue.

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
		and in particular to the requirement under Part I (b). The requirement that the enterprise needs to have been established for three years to prove its financial viability and that it will remain financially viable is unnecessarily restrictive. The policy should be altered to state that provided a sound business plan is in place, which can prove the future financial viability of the site, then that is adequate enough to permit the development of permanent dwellings for rural workers.	the requirement that the enterprise needs to have been established for at least three years.	
13.58	HOU5	As written, part III of this policy omits the allowance for person(s) last employed in an agriculturally tied dwelling or their dependents from occupying. This is in conflict with the model condition set out in Circular 11/95.	Agreed. The Policy wording has been amended.	<p>Amendment to Policy HOU5, Part III:</p> <p>III. Where a new dwelling is permitted, the occupany will be restricted by condition to ensure that it is occupied by a person or persons currently employed, <u>or last employed</u>, in agriculture, forestry or other rural business, <u>or a widow or widower of such a person, and to any residents dependants</u>.</p>
Housing for Older and Vulnerable People				
13.59	HOU6	Hertfordshire County Council supports policy HOU6. Health and Community Services have advised that in East Herts there is a predicted need for an additional 49 flexicare flats by 2015; a further 97 by 2020; and an additional 149 by 2030, giving a total growth by 2030 of 295 flats. East Herts is a very	Support and comments welcomed.	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
		desirable place to live, and one of the local forums has advised that they have great difficulty in finding move on accommodation for those people with Learning Difficulties.		
13.60	HOU6	Hertfordshire County Council comment that at I (b) there appears to be a typographical error in the wording.	It is not clear what HCC are referring to in this instance. Further clarification has been sought and HCC has confirmed that no further action is required.	No amendment in response to this issue
13.61	HOU6	Part (l) should include a requirement for bungalows.	<p>Comment noted. However, it is considered to be too prescriptive to require through policy a specific requirement for the provision of bungalows. A new policy regarding the provision of adaptable and accessible dwellings to meet the changing needs of occupiers over their lifetimes has been included in the Plan (Policy HOU7).</p> <p>The supporting text (paragraph 13.8.4) has been amended to include reference to the provision of bungalow accommodation.</p>	<p>Amendment to text (new paragraph 13.8.4)</p> <p><u>13.8.4 The Council will require that all development schemes provide accessible and adaptable homes to meet the changing needs of occupants over their lifetime, and will encourage the provision of specialist types of retirement housing (within the C3 Use Class), such as sheltered housing and flexi-care housing, as part of the development of larger sites. Consideration should also be given to the provision of bungalows which have been identified as a preferred housing type by many older people in the District.</u></p>
13.62	HOU6	<p>HOU6 is supported, which reflects the requirement of paragraph 50 of the NPPF for local planning authorities to plan for a mix of housing that reflects the needs of different community groups, including older people.</p> <p>Proposal to allocate land at Thomas Rivers, Sawbridgeworth as retirement village with a range of accommodation</p>	<p>Support noted and welcomed.</p> <p>The issue of proposed development at the Thomas Rivers site is considered through the Sawbridgeworth Settlement Appraisal.</p>	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
		for the elderly.		
Gypsies and Travellers and Travelling Showpeople				
13.63	13.9	Section incomplete and will need finalising before the Plan is finalised.	This section was unable to be finalised in advance of an up to date Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment being concluded. The Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016 has now been finalised, which has enabled completion of the Policy.	No amendment in response to this issue
13.64	HOU7 (now HOU9)	<p>Stevenage Borough Council's Gypsy and Traveller Accommodation Assessment identifies a short term requirement for 3 pitches (to 2018) with an estimated need for an additional 3 to 5 pitches in each 5 year period thereafter. Their survey showed that all future new forming households would prefer to live in East Herts. Notwithstanding this, the Council has included these households in their figures of future need and will plan, in the first instance, on the assumption that this requirement should be met in Stevenage.</p> <p>However, the Council is mindful that they should consider non-Green Belt sites ahead of Green Belt locations. Stevenage is a tightly constrained</p>	<p>Comments noted. Duty to Co-operate discussions are ongoing between the two councils and have covered matters pertaining to traveller provision.</p> <p>However, the Stevenage Borough Local Plan 2011-2031, Publication Draft January 2016, states that it is "considered that the site allocated by Policy HO12 is sufficient to meet all permanent Gypsy and Traveller needs arising within the plan period".</p> <p>Therefore, in light of this, and the fact that the East Herts Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study, 2014, was unable to identify any potential new sites in locations beyond the Green Belt, at this stage it is not considered that there are any pressing Duty to Co-operate issues in respect of to be address through the District Plan.</p>	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
		authority with limited undeveloped land outside of the Green Belt and competing demands upon those sites that are available. Stevenage Council would therefore welcome the opportunity to discuss the matter of future Gypsy and Traveller provision under the Duty to Co-operate. In particular, whether there are any suitable non-Green Belt locations for a new site in East Hertfordshire which may be preferable in planning terms to any Green Belt locations in Stevenage for medium- to long-term provision.		
13.65	HOU7 (now HOU9)	Policy is incomplete – needs and location of pitches and lots should be identified.	Section was unable to be completed in advance of an up to date Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment being completed. The Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016 has now been undertaken, which has enabled completion of the Policy.	No amendment in response to this issue
13.66	HOU7 (now HOU9)	Great Munden Parish Council considers that there should be no further pitches at Field Farm, Levens Green.	Field Farm, Levens Green is an existing authorised Gypsy and Traveller site with the benefit of planning permission. It is not intended that further pitches are to be allocated at this site as part of Policy HOU9. However, should any further development proposals be submitted for the site in the future, the suitability of these would need to be considered at that time, taking into account the criteria included in Policy HOU9 and 'Planning policy for traveller sites'.	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
13.67	HOU7 (now HOU9)	The Environment Agency support part (h) but suggest this should be expanded. In line with the Planning Practice Guidance 'highly vulnerable' development should not be located within either Flood Zones 3a or 3b. It is then only appropriate in Flood Zone 2 subject to the Exception Test. To ensure safety this point should be strengthened so that all highly vulnerable development is restricted to Flood Zone 1.	The suggested text would go beyond the guidance in 'Planning policy for traveller sites' which includes 'cover all' wording. The Environment Agency, as statutory consultee, would have the opportunity to comment on applications having floodzone implications.	No amendment in response to this issue
13.68	HOU7 (now HOU9)	Epping Forest District Council expresses concern that (a) the consultation is proceeding before a traveller accommodation needs assessment has been commissioned and (b) a five-year deliverable supply of sites has therefore not been identified. The Council is disappointed that the options of collaborative working and joint development plan provision for the travelling community have apparently not been considered.	While the section was unable to be finalised at the Preferred Options Consultation stage in advance of an up to date Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment being completed, it did provide the framework within which the identified numbers of pitches and plots would sit. The Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016 has now been undertaken, which has enabled completion of the Policy in the context of an up to date evidence base and in compliance with 'Planning policy for traveller sites'. Policy HOU7 now seeks to provide a five-year deliverable supply of sites and beyond to meet need throughout the Plan period. The Council has always fully acknowledged its Duty to Cooperate responsibilities and has sought to engage with all neighbouring authorities throughout the plan making process. Due to the number of surrounding neighbouring authorities and varying stages of their plan preparation, a joint development	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
			<p>document is not considered appropriate at this time.</p> <p>A Memorandum of Understanding (MOU) is being prepared, which will be signed by the four local authorities that comprise the housing market area, including East Herts. The MOU will identify the way in which identified housing needs, including the needs of Gypsies and Travellers and Travelling Showpeople, will be distributed across the housing market area. In particular, it will confirm that all four local authorities are committed to meeting their respective needs within their own administrative area.</p>	
13.69	HOU7 (now HOU9)	Broxbourne Council would like to be reassured that East Herts is planning for its own gypsy and traveller and travelling showpeople needs on sites within its district boundaries.	Policy HOU9 details specific locations to meet the identified accommodation needs of Gypsies & Travellers and Travelling Showpeople over the Plan period on sites within the district boundaries.	No amendment in response to this issue
13.70	HOU7 (now HOU9)	The District Plan does not consider the need for or make any reference to providing transit pitches for Gypsies and Travellers. It is possible that there is no need to provide an additional transit site within Hertfordshire; however there may be a need for alternative transit provision, for example visitor pitches. The provision of transit accommodation to meet need generated by current and future patterns of travelling is considered a strategic issue, as defined by Paragraph 156 of the NPPF. The best way to understand and assess need for future transit provision is	The Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016 considered this matter, but concluded that there is not an identified need for transit provision in East Herts at this time.	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
		through joint studies at a County level.		
13.71	HOU7 (now HOU9)	The Draft District Plan does not consider the need for or make any reference to the current need for public pitches. There are currently 11 public sites in Hertfordshire which are managed by the County Council. There are currently 166 families on the waiting list for a pitch on a public site within the County. Meeting the need for pitches on public sites within Hertfordshire is a matter affecting more than one planning authority and as such work to understand and assess the need for future provision of public sites should be dealt with through joint working at the county level.	The Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016 considered this matter, but concluded that there is not an identified need for public site provision in East Herts at this time.	No amendment in response to this issue
Replacement Buildings in the Green Belt and Rural Area Beyond the Green Belt				
13.72	HOU8	This policy and supporting text would be better included in Chapter 4 Green Belt since it relates to more than just housing and hence a reader would expect to find such a policy in the Green Belt chapter rather than the Housing chapter. A note could be included in the supporting text referring the reader to Chapter 4 for policy in respect of replacement dwellings in the Green Belt and Rural Area.	Comment noted. Policy HOU8 will be deleted and matters related to replacement buildings will be considered in accordance with Policies GBR1 and GBR2. A new paragraph (13.12.3) to be added referring the reader to Chapter 4: Green Belt and Rural Area Beyond the Green Belt.	Amendment to Section 13.10 (renumbered as 13.12) New paragraph 13.12.3 added. <u>13.12.3 The replacement of a building in the Green Belt or the Rural Area Beyond the Green Belt will be permitted provided the new building is in the same use and is not materially larger than the one it replaces in accordance with Policy GBR1 (Green Belt) and Policy GBR2 (Rural Area Beyond the Green Belt).</u>

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
				<p>Policy HOU8 deleted.</p> <p>HOU8 Replacement Buildings in the Green Belt and Rural Area Beyond the Green Belt</p> <p>Replacement buildings on a one for one basis, in the Green Belt and Rural Area Beyond the Green Belt, may be permitted provided the new building:</p> <ul style="list-style-type: none"> (a) is in the same use; (b) is not more visually intrusive or harmful to the openness of the site and its surroundings than the one it replaces; (c) is designed in accordance with Policy DES1 (Local Character and Amenity) and does not conflict with other policies in this Plan
13.73	HOU8	Local Plan Policy HSG8 includes the phrase "the volume of the new dwelling is not materially larger than the dwelling to be replaced". The District Plan cites a similar phrase in paragraph 13.10.1 Tewin Parish Council question whether this wording should also appear in the Policy HOU8?	Comment noted. Policy HOU8 to be deleted and matters related to replacement buildings will be considered in accordance with Policies GBR1 and GBR2. A new paragraph (13.12.3) to be added which refers to a replacement building not being materially larger than the one it replaces.	<p>New paragraph 13.12.3 added.</p> <p><u>13.12.3 The replacement of a building in the Green Belt or the Rural Area Beyond the Green Belt will be permitted provided the new building is in the same use and is not materially larger than the one it replaces in accordance with Policy GBR1 (Green Belt) and Policy GBR2 (Rural Area Beyond the Green Belt).</u></p>

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
13.74	HOU8	The NPPF sets out clearly policies for replacement dwellings in the Green Belt and, unlike PPG2 which it replaced, does not give local planning authorities discretion to set its own policy. It is not clear why the same provisions are being applied to the remainder of the rural area.	Comment noted. East Herts has a long established tradition of restraint on inappropriate development within the Rural Area Beyond the Green Belt. This is a recognition that the environmental assets of the district require an equally protective policy framework and has ensured the protection of the smaller rural settlements, as well as the wider area of countryside.	No amendment in response to this issue
13.75	HOU8	Policy supported as it is in compliance with the NPPF and PPG.	Support noted and welcomed. However it should be noted that Policy HOU8 has been deleted and matters related to replacement buildings will be considered in accordance with Policies GBR1 and GBR2. A new paragraph (13.12.3) to be added referring the reader to Chapter 4: Green Belt and Rural Area Beyond the Green Belt.	No amendment in response to this issue
13.76	HOU8	Policy supported by Great Munden Parish Council.	Support noted and welcomed. However it should be noted that Policy HOU8 has been deleted and matters related to replacement buildings will be considered in accordance with Policies GBR1 and GBR2. A new paragraph (13.12.3) to be added referring the reader to Chapter 4: Green Belt and Rural Area Beyond the Green Belt.	No amendment in response to this issue
13.77	HOU8	Replacement buildings should not result in changes to the rights of way network.	Comment noted. A new section (Section 18.4) and policy (CFLR3 Public Rights of Way) has been included in Chapter 18: Community Facilities, Leisure and Recreation. This section and policy states that 'proposals for development must not adversely affect any Public Right of Way'.	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
Extensions and Alterations to Dwellings and Residential Outbuildings				
13.78	HOU9	The policy is too restrictive and could be interpreted as stating that the character of the existing dwelling and surrounding area should be preserved. The policy should state that change is acceptable providing that new development is visually attractive and that appropriate innovation is supported (NPPF policy 58).	<p>Not agreed. The Policy states that the character of the existing dwelling and surrounding area should not be significantly affected to their detriment. It does not state that the character of the existing dwelling and surrounding area should be preserved, and that change would be unacceptable.</p> <p>Notwithstanding this, Policy HOU9 is to be deleted, and matters relating to the impact of extensions and alterations to dwellings on the character of the existing dwelling and surrounding area will be considered in accordance with HOU11 (Extensions and Alterations to Dwellings, Residential Outbuildings and Works Within Residential Curtilages) and DES3 (Design of Development).</p>	No amendment in response to this issue
13.79	HOU9	As reworded from the existing Local Plan, this now policy is an improvement. With regard to buildings in the Green Belt, the NPPF guidance prevails. However, it is not clear why the Policy should also be applied to the remainder of the rural area; it should be justified, qualified or deleted.	<p>Comment noted. East Herts has a long established tradition of restraint on inappropriate development within the Rural Area Beyond the Green Belt. This is a recognition that the environmental assets of the district require an equally protective policy framework and has ensured the protection of the smaller rural settlements, as well as the wider area of countryside.</p> <p>Notwithstanding this, Policy HOU9 has been deleted and matters relating to extensions to dwellings will be considered in accordance with Policies GBR1 (Green Belt), GBR2 (Rural Area Beyond the Green Belt), HOU11 (Extensions and Alterations to Dwellings, Residential Outbuildings and Works Within Residential Curtilages) and DES3</p>	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
			(Design of Development).	
13.80	HOU9	It should be made clear that this policy applies over and above permitted development.	<p>Comment noted. However, all policies only apply to development proposals that require planning permission.</p> <p>It should be noted that Policy HOU9 has been deleted and matters relating to extensions to dwellings will be considered in accordance with Policies GBR1 (Green Belt), GBR2 (Rural Area Beyond the Green Belt), HOU11 (Extensions and Alterations to Dwellings, Residential Outbuildings and Works Within Residential Curtilages) and DES3 (Design of Development).</p>	No amendment in response to this issue
13.81	HOU9	Policy supported by Great Munden Parish Council.	<p>Support noted and welcomed.</p> <p>It should be noted that Policy HOU9 has been deleted and matters relating to extensions to dwellings will be considered in accordance with Policies GBR1 (Green Belt), GBR2 (Rural Area Beyond the Green Belt), HOU11 (Extensions and Alterations to Dwellings, Residential Outbuildings and Works Within Residential Curtilages) and DES3 (Design of Development).</p>	No amendment in response to this issue
13.82	HOU10 (now HOU11) (d)	The word 'original' should be deleted, so that the policy has scope for appropriate redesign of roofscapes including dormers.	Agreed. The word 'original' will be removed from the policy wording.	<p>Amendment to Policy HOU10, (d):</p> <p>(d) roof dormers may be acceptable if appropriate to the design and character of the original dwelling and its surroundings.</p>
13.83	HOU10 (now	It should be made clear that this policy applies over and above permitted	Comment noted. However, all policies only apply to development proposals that require planning	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
	HOU11)	development.	permission.	
13.84	HOU10 (now HOU11)	Policy supported by Great Munden Parish Council.	Support noted and welcomed	No amendment in response to this issue
13.85	HOU10 (now HOU11)	Policy should include wording to prevent loss of front gardens and boundary walls/landscaping as a result of redevelopment of land for the purpose of car parking.	Comment noted. However, planning permission is not required to build or replace a driveway of any size provided that permeable surfacing is used and rainwater flows to a lawn or border to drain naturally.	No amendment in response to this issue
13.86	HOU10 (now HOU11)	Policy should state that extensions should not result in the loss of rear or side amenity space.	Not agreed. An extension, by its nature, will result in the loss of some amenity space.	No amendment in response to this issue
13.87	HOU11 (now HOU12)	The Council combines policies for Green Belt and non-Green Belt locations and in each regard seems to ignore what may be achieved via domestic permitted development rights. (a) is therefore unacceptable. (b) is acceptable as a basis against which to assess proposals which require express planning approval.	<p>Comment noted. East Herts has a long established tradition of restraint on inappropriate development within the Rural Area Beyond the Green Belt. This is a recognition that the environmental assets of the district require an equally protective policy framework and has ensured the protection of the smaller rural settlements, as well as the wider area of countryside.</p> <p>Notwithstanding this, Policy HOU11 has been deleted and matters relating to residential outbuildings will be considered in accordance with Policies GBR1 (Green Belt), GBR2 (Rural Area Beyond the Green Belt), HOU11 (Extensions and Alterations to Dwellings, Residential Outbuildings and Works Within Residential Curtilages) and DES3 (Design of Development).</p> <p>All policies only apply to development proposals</p>	<p>Policy HOU11 deleted</p> <p>Policy HOU11 Residential Outbuildings</p> <p>Proposals for residential outbuildings or extensions to existing outbuildings will be considered against the following criteria:</p> <p>(a) where located within the Green Belt and Rural Area Beyond the Green Belt, proposals for residential outbuildings should not result in disproportionate additions over and above the size of the original dwelling (including existing outbuildings) nor intrude into the openness of the site and the surrounding area;</p> <p>(b) be of an appropriate size, scale, mass, form, siting, design and materials of construction such that the character and appearance of the site and its surroundings, and the amenities of the current and future</p>

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
			that require planning permission.	occupiers of the dwelling and any adjoining dwellings would not be significantly affected to their detriment.
13.88	HOU11 (now HOU12)	Policy supported by Great Munden Parish Council.	Support noted and welcomed. It should be noted that Policy HOU11 has been deleted and matters relating to extensions to dwellings will be considered in accordance with Policies GBR1 (Green Belt), GBR2 (Rural Area Beyond the Green Belt), HOU11 (Extensions and Alterations to Dwellings, Residential Outbuildings and Works Within Residential Curtilages) and DES3 (Design of Development).	No amendment in response to this issue
Change of Use of Land to Residential Garden and Enclosure of Amenity Land				
13.89	HOU12	Policy is not strong enough in Green Belt areas, where the extension of a residential garden would be an encroachment into the countryside and therefore inappropriate. There should be provision for the removal of permitted development rights in the extended part of the curtilage otherwise future built development could take place within the extended garden without the need for further permission.	Comment noted. Paragraph 13.14.1 of the supporting text has been amended to explain that permitted development rights may be removed from residential garden extensions.	Amendment to paragraph 13.12.1 (now 13.14.1) The Council seeks to ensure that changes of use of land to residential garden do not result in harmful incursions into the countryside that would have an adverse effect on the character and appearance of rural landscapes. The residential use of rural land can have adverse effects on the character of the countryside from, for example, the erection of fences, garden sheds and other domestic paraphernalia. <u>Where necessary, conditions may be attached to planning permissions for residential garden extensions which remove the occupier's permitted development rights.</u>

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
13.90	HOU12	Policy supported by Great Munden Parish Council.	Support noted and welcomed.	No amendment in response to this issue
13.91	HOU12	The Plan should be reinforced to state that change of use of land to residential garden and enclosure of amenity land should not result in changes to the rights of way network and that footpaths and bridleways across such land must be kept clear of obstructions.	Comment noted. A new section (Section 18.4) and policy (CFLR3 Public Rights of Way) has been included in Chapter 18: Community Facilities, Leisure and Recreation. This section and policy states that 'proposals for development must not adversely affect any Public Right of Way'.	No amendment in response to this issue
Residential Annexes				
13.92	HOU13	This policy is supported as it represents a more flexible approach than Adopted policy EN8.	Support noted and welcomed. Note Policy has been amended for clarity.	No amendment in response to this issue.

Other Proposed Amendments

Policy/Paragraph Number	Issue	Proposed Amendment
13.1.2	Paragraph updated to refer to extended Plan period	This chapter sets out the Council's approach to addressing the need for different types of housing within the District up to 2034 <u>2033</u> .
13.2.1	Paragraph rewritten to refer to NPPF and evidence base	A key aspect of creating sustainable mixed communities is maintaining a variety of housing, particularly in terms of tenure and price, and a mixture of different households such as families with children, single person households and older people. <u>The National Planning Policy Framework (NPPF) states in paragraph 47 that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. Paragraph 50 states that local planning authorities should plan for a mix of housing, based on current and demographic trends, market trends and the needs of different groups in the community. It goes on to say that local planning authorities should identify the size, type, tenure and range of housing that is required in different locations.</u>

13.2.2	Paragraph updated to refer to latest evidence base	<ul style="list-style-type: none"> • The West Essex and East Hertfordshire Strategic Housing Market Assessment (SHMA) (2015); • The Older People's Housing Requirements Technical Study (2013);
13.2.3	Paragraph updated to refer to the SHMA (2015)	The SHMA Update (March 2013) identifies dwelling requirements by tenure and size mix. Based on Figure 41 in the SHMA the following tenure/size mix proportions are identified for the District Plan period. The SHMA (2015) sets out the mix of market and affordable housing need in the District by dwelling type and size over the period 2011-2033.
Table 13.1	Table updated to refer to the SHMA (2015)	See new Table 13.1 in Chapter.
Information Box	Box updated to refer to the SHMA (2015), plus other minor amendment for clarity	<p>The West Essex and East Hertfordshire Strategic Housing Market Assessment (2015) can be viewed and downloaded from the Council's Website at: www.eastherts.gov.uk/shma</p> <p>The London Commuter Belt (East) Sub-Region: Older People's Housing Requirements Study (October 2013) can be viewed and downloaded from the Council's Website at: www.eastherts.gov.uk/olderpeoplestudy</p> <p>The Council's latest Housing Strategy can be viewed and downloaded from the Council's Website at: www.eastherts.gov.uk/housing</p>
13.2.4	<p>Reference to Lifetime Homes deleted. All local standards, including Lifetime Homes, have been replaced by a suite of national standards that cover accessibility, energy efficiency, water efficiency, security and internal space standards.</p> <p>Additional wording included on ageing population.</p>	<p>Another key issue for East Herts is its ageing population. Proposals which include an element of 'Lifetime Homes' will help to ensure enough appropriate housing is available in the future. The Lifetime Homes Standard has been developed to support the construction of flexible, adaptable and accessible homes that can respond to the changing needs of individuals and families at different stages of life at minimal cost. ONS population forecasts show that there will be 87.5% more older people (65+) by 2037. The largest increase within the 65+ group are those aged over 85, a 189.6% increase, which potentially means a significant increase in the need for support services and housing with support. It is therefore important that the District Plan takes a positive approach to planning ahead for the housing issues that will arise from the ageing population. Providing a range of house types including bungalows and accessible apartments will enable greater choice for those who need single floor accommodation.</p>

HOU1	Reference to Lifetime Homes deleted. All local standards, including Lifetime Homes, have been replaced by a suite of national standards that cover accessibility, energy efficiency, water efficiency, security and internal space standards.	III. In order to encourage new homes that are readily adaptable to meet the changing needs of occupants, and to support independent living, at least 15% of all new dwellings are expected to be constructed to 'Lifetime Homes' standards.
HOU1	Criterion number amended. Minor amendment to policy wording for clarity.	III IV. Provision of specialist housing will be encouraged for older people and vulnerable groups, across all tenures, on suitable sites in appropriate and sustainable locations in accordance with Policy HOU6 (<u>Specialist Housing for Older and Vulnerable People</u>).
HOU1	New criterion added to reflect the duties placed on the Council by the Self-Build and Custom Housebuilding Act 2015.	<u>V. Self-Build Housing in accordance with Policy HOU8 (Self-Build Housing)</u>
HOU1	Criterion number amended. Amendment to policy wording to reflect change in Policy number from HOU7 to HOU9 . Amendment to policy wording to make reference to new policy HOU10.	VI. Where appropriate, provision of specialist accommodation will be expected for Gypsies and Travellers and Travelling Showpeople <u>and Non-Nomadic Gypsies and Travellers and Travelling Showpeople</u> , in appropriate and sustainable locations in accordance with Policy HOU7 <u>9</u> (Gypsies and Travellers and Travelling Showpeople) <u>and Policy HOU10 (New Park Home Sites for Non-Nomadic Gypsies and Travellers and Travelling Showpeople)</u> .
13.3.3	Paragraph amended for clarity.	The Council will expect all housing schemes to propose densities which are sensitive to the character of the local area, and take account of on-site constraints and the <u>availability of sustainable transport options</u> level of local transport accessibility and parking . At the same time, applicants should also have regard to making efficient use of land, as this can help to reduce the amount of building on greenfield sites. Major schemes should include a range of housing density areas, to ensure varied character and appearance.
HOU2	Policy wording amended to reflect amendments to Policy Number and title from DES1 to DES3, Policy Number and title from CFLR2 to CFLR1, and Policy Number from NE3 to NE4.	I. Housing development should make efficient use of land. Proposals are required to demonstrate how the density of new development has been informed by the character of the local area and contributes to: (a) The design objectives set out in Policy DES4 <u>3</u> (Local Character and Amenity <u>Design of Development</u>); (b) Improving the mix of house types in accordance with Policy HOU1 (Type and Mix of Housing); <u>and</u>

		<p>(c) Providing adequate levels of public open space in accordance with Policy CFLR21 (Open Space Standards <u>Open Space, Sport and Recreation</u>); and</p> <p>(d) Retaining existing site features, including mature trees, shrubs, hedgerows and amenity areas, and make provision for new green infrastructure in accordance with Policy NE34 (Green Infrastructure).</p>
HOU2	Policy amended to allow for a more flexible approach which takes account of the character of the surrounding area	<p>II. Subject to the above, densities will vary according to the relative accessibility and character of locations. Higher average net densities (30+ dph) will be favourably considered on central sites in or near town centres <u>and where the character of the surroundings allows</u>.</p> <p>III. Medium average net densities (30 dph) will normally be appropriate for sites that are in more peripheral locations within and on the edge of these settlements.</p> <p>IV. In villages and for some other locations lower average net densities (less than 30 dph) may be more appropriate to respond to local character and context.</p>
13.4.1	Paragraph amended for clarity.	The location of East Herts on the periphery of London means that the affordability of housing is a key issue <u>across the District</u> .
13.4.2	Paragraph updated to reflect the upcoming change to the definition of affordable housing to include starter homes.	<u>Affordable housing is housing provided at a cost below current market rates to eligible households, whose needs are not adequately served by the commercial housing market. For planning purposes, affordable housing has a specific definition as set by the NPPF and is currently defined as social rented, affordable rented and intermediate housing. However, the Housing and Planning Act 2016 inserts a new affordable housing definition into the Town and Country Planning Act 1990, which will, once enacted through secondary legislation, amend the definition of affordable housing to include starter homes. The NPPF currently defines affordable housing as 'social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market'.</u>
13.4.3	Paragraph amended to update the affordable housing need to reflect the evidence from the SHMA 2015.	There is a significant need for additional affordable housing within East Herts as set out in the latest Strategic Housing Market Assessment (<u>SHMA</u>) 2015. <u>The table below sets out the current unmet need for affordable housing in the District, together with the projected future affordable need for the 22-year period 2011-2033: (SHMA).</u> Using the 'Trend Based Projections' the SHMA Update (March 2013) at Figure 39, has identified for the District Plan period, a

		<p>housing requirement tenure mix of:</p> <ul style="list-style-type: none"> • Market Housing: 51% • Intermediate Affordable Housing/Shared Ownership: 32% • Social Rented/Affordable Rented: 17%
New Table 13.2	New table inserted showing the need for affordable housing to reflect the evidence from the SHMA 2015.	<u>See Table 13.2 in Chapter.</u>
New 13.4.5	New paragraph to explain the reasoning behind amended the amended threshold at which affordable housing will be sought.	<u>Planning Practice Guidance states that affordable housing contributions should not be sought from sites proposing development of 10 units or less and where the dwellings would have a combined gross internal floor space of 1,000 square metres or less. Therefore, the affordable housing requirement has not been set at 31% in recognition of the fact that not all developments will contribute to the provision of affordable housing.</u>
New 13.4.6	New paragraph to reflect the updated viability evidence contained in the Delivery Study.	<u>The percentage of affordable housing provision that the Council will expect to secure from development schemes has been informed by development viability assessments. The aim is to maximise affordable housing provision and the viability assessments demonstrate that the targets of 35% and 40% as required in Policy HOU3, are viable for most developments in most locations across the District, and can be realistically achieved without constraining the overall delivery of housing.</u>
Information Box	Box updated to refer to the Delivery Study	The East Herts Viability Assessment (2012) can be viewed and downloaded from the Council's website at: www.eastherts.gov.uk/viabilitystudy <u>The Delivery Study can be viewed and downloaded at: www.eastherts.gov.uk/deliverystudy</u>
13.4.4	Paragraph deleted as evidence is out of date.	The SHMA has, therefore, identified a total affordable housing requirement of 49% of all housing provision. In terms of the affordable housing element, it shows a tenure mix of 66% intermediate/shared ownership and 34% social/affordable rented. This finding, which is projected over the plan period, is different to that which the Council currently seeks of 75% social/affordable rented and 25% intermediate/shared ownership.
13.4.5	Paragraph deleted as information is out of date.	Since the SHMA was updated, a number of the affordable housing products have either been refined or are not being developed by Registered Providers (housing associations) in East Herts. The intermediate affordable products being developed by Registered Providers, have been reduced down to one, which is shared ownership and is offered to any resident that qualifies and

		can afford to purchase. The previous intermediate rent product, that was set at 80% of market rent and offered on an assured short hold tenancy, is no longer being developed and has become part of the affordable rent products, let through the Council's Housing Register, on either lifetime or fixed term tenancies and is, therefore, comparable to social rent. There are currently no new properties being developed that are specifically for key workers or offered on an intermediate rent outside the Council's Housing Register.
New 13.4.7	New paragraph to show the mix of affordable housing required to reflect the evidence from the SHMA 2015.	<u>Table 13.3 sets out the housing mix requirements in terms of property type (house or flat), size and affordable housing tenure.</u>
New Table 13.3	New table inserted showing the mix of affordable housing required to reflect the evidence from the SHMA 2015.	<u>See Table 13.3 in Chapter.</u>
New 13.4.9	New paragraph to explain the national policy context on starter homes with regard to the tenure mix required from affordable housing.	<u>Effective affordable housing provision is not just about quantity; of equal importance is ensuring the right type of provision. The SHMA 2015 identifies the greatest need for affordable housing is from those requiring housing from the affordable rent tenure. However, the Housing and Planning Act 2016 has introduced the requirement for local authorities to promote the supply of starter homes. The Act sets out a definition of starter homes and signals the Government's intention to require a set proportion of starter homes to be delivered on qualifying sites, the level of which will be confirmed by secondary legislation.</u>
New 13.4.10	New paragraph to explain the national policy context on starter homes with regard to the tenure mix required from affordable housing.	<u>The Government's 'Starter Homes Technical Regulations' consultation indicates the intention for starter homes to apply to sites proposing 10 dwellings or more (or over 0.5ha in size) and for a minimum level of provision of 20% to apply. The consultation also suggests that in cases where an adopted affordable housing policy seeks a requirement for affordable housing in excess of 20%, only in circumstances where the 20% starter homes requirement is firstly met can any remaining proportion of other affordable housing tenures be sought.</u>
13.4.7	Paragraph deleted as evidence is out of date.	The Council recognises that the level of affordable housing provision set out in Policy HOU3 is less than the 49% indicated in the SHMA, and that as a consequence is insufficient to meet local need. Policy HOU3 sets out the percentage of affordable housing that the Council will expect to secure. This has been informed by development viability assessments. The aim is to maximise affordable housing provision and the viability assessments demonstrate that the targets of 30% and 40% as required in Policy HOU3, are

		viable for most developments in most locations across the district, and can realistically be achieved without constraining overall delivery of housing.
13.4.8	Paragraph deleted and some of the wording reflected in new paragraph 13.4.11.	Due to the continuing demonstrable pressing need for social and affordable rented housing, priority will be given to this tenure over intermediate/shared ownership. In this way those in most need of affordable housing continue to be given priority. There is also a case that in order to continue creating mixed and balanced communities, affordable housing tenures on larger sites should reflect a more balanced mix.
13.4.9	Paragraph deleted as evidence is out of date.	Policy HOU3, therefore, sets out that on: <ul style="list-style-type: none"> • Small to medium sized sites, proposing between 5 and 199 dwellings, the affordable housing will be expected to be provided with a tenure mix of 75% social/affordable rented and 25% intermediate/shared ownership. • Large sites proposing 200 and more dwellings, the affordable housing will be expected to be provided with a tenure mix of 60% social/affordable rented and 40% intermediate/shared ownership.
New 13.4.11	New paragraph to set out the tenure mix that will be sought from affordable housing.	<u>Policy HOU3, therefore, has to have regard to the provision of starter homes. As such, the policy sets out that affordable housing provision will be expected to incorporate a mix of tenures taking account of the Council's most up to date evidence on housing need. The tenure mix will be negotiated by the Council on a site by site basis, having regard to the affordable housing products defined within the National Planning Policy Framework. However, due to the continuing demonstrable need for affordable rented housing, as evidenced in the SHMA, the Council will seek to maximise provision of this tenure to ensure that the needs of those in most need of affordable housing are met.</u>
13.4.12	Paragraph deleted as the threshold at which affordable housing will be sought has been amended.	Policy HOU3 states that the Council will seek affordable housing on developments of 5 or more dwellings, or the related site size. It is considered that this is a realistic threshold, which enables the delivery of affordable housing and does not prevent the delivery of smaller housing sites within the District.
13.4.14	Paragraph split into 3 new paragraphs for clarity (13.4.15, 13.4.16 and 13.4.17). Amendments made to paragraph wording for clarity.	13.4.14 ¹⁵ In general affordable housing should be provided on the application site. <u>Off-site provision or financial contributions in lieu will only be accepted in exceptional circumstances where agreed with the Council. Applicants proposing off-site provision or financial contributions in lieu will be expected to provide</u>

		<p><u>justification as part of a planning application.</u></p> <p><u>13.4.16</u> Wherever possible, the affordable houses should be integrated within the scheme through ‘pepper-potting’ rather than concentrated in a particular area unless site specific considerations dictate otherwise. This does not necessarily mean that every second or third property should be affordable; rather the affordable housing should be distributed <u>across the entire site in clusters appropriate to the size and scale of the development evenly across the entire site</u>, as this ensures the best prospect of securing mixed, inclusive communities. The design and appearance of affordable housing should be indistinguishable from market units.</p> <p><u>13.4.17</u> Further guidance on ‘pepper-potting’ and the Council’s approach to affordable housing <u>and the implementation of this policy will be provided in an updated ‘Affordable Housing’ Supplementary Planning Document.</u> is set out in the Council’s ‘Affordable Housing and Lifetime Homes’ (2008) Supplementary Planning Document (or as amended).</p>
13.4.15	Paragraph deleted and wording added to new paragraph 13.4.15.	In general affordable housing should be provided on the application site. <u>Off-site provision or financial contributions in lieu will only be accepted in exceptional circumstances where agreed with the Council. Applicants proposing off-site provision or financial contributions in lieu will be expected to provide justification as part of a planning application.</u>
HOU3 – Part I.	Policy wording amended for clarity.	I. <u>Affordable housing provision will be expected on all development sites that propose development that falls within Class C3 (Dwelling Houses) as follows:</u> Affordable Housing provision will be expected with all Class C3 (Dwelling House) developments as follows:
HOU3 – Part I.	New criterion (a) added to policy to reflect the thresholds for seeking affordable housing provision set out in Planning Practice Guidance.	<u>(a) up to 35% on sites proposing 10 or fewer gross additional dwellings, and where the dwellings would have a combined gross floor space greater than 1,000 square metres;</u>
HOU3 – Part I.	Amendment to criterion (a) (now criterion (b)) to remove the site size threshold. The site size thresholds are no longer considered to be necessary to ensure the provision of affordable housing as a	<u>(b) up to 305% on sites proposing 511 to 14 gross additional dwellings, or between 0.17 and 0.49 hectares in size;</u>

	floorspace threshold has been included within national policy.	
HOU3 – Part I.	Amendment to criterion (b) (now criterion (c)) to remove the site size threshold. The site size thresholds are no longer considered to be necessary to ensure the provision of affordable housing as a floorspace threshold has been included within national policy.	(a) up to 40% on site proposing 15 or more gross additional dwellings, or 0.5 hectares in size.
HOU3 – Part III.	Policy wording amended to reflect change in Part I. of policy.	III. Lower provision may be permitted if it is demonstrated that the 30 5 % and 40%, as appropriate referred to in I (a), and (b) <u>and (c)</u> above, cannot be achieved due to viability reasons or where it would prejudice the need to secure other infrastructure priorities. <u>Applicants seeking to justify a lower percentage level of affordable housing to that referred to in I (a), (b) and (c) above, will be required to provide a financial viability assessment as part of the planning application. Where agreement is not reached, external independent consultants, agreed by both the Council and applicant, will be appointed by the developer, to undertake further independent viability assessment. The applicant will be required to meet the costs of this independent assessment.</u>
HOU3 – Part IV.	Part IV. of policy deleted and majority of wording added to Part III. Reference to tenure mix deleted to reflect change to Part II. of policy HOU3.	IV. Applicants seeking to justify a lower percentage level of affordable housing and/or different tenure mix, to that referred to in I (a) and (b) and II (a) and (b) above, will be required to provide a financial viability assessment as part of the planning application. Where agreement is not reached, external independent consultants, agreed by both the Council and applicant, will be appointed by the developer, to undertake further independent viability assessment. The applicant will be required to meet the costs of this independent assessment.
HOU3 – Part VI. (now Part V.)	Policy wording amended for clarity and to reflect change to paragraph 13.4.14 (now paragraph 13.4.18).	VI. The affordable housing units should be integrated into the open market housing development using appropriate design methods, i.e. tenure blind, <u>and 'pepper-potted' across the site in clusters appropriate to the size and scale of the development.</u>
HOU3 – Part VII. (now Part VI.)	Policy wording amended for clarity and to reflect the change in definition of affordable housing to include starter homes.	VII. To secure the benefits of affordable housing for first and subsequent occupiers, such affordable housing <u>affordable rented and intermediate housing</u> will be retained as affordable by means of an appropriate legal agreement <u>or condition</u> with the Council, or the subsidy will be recycled for alternative affordable housing provision.

New 13.6.6	New paragraph to reflect the approach to be taken to the provision of starter homes on rural exception sites.	<u>Rural exception sites are not required to provide starter homes and the Council will not accept starter homes as part of the affordable housing provision on site. Consideration will however be given to the inclusion of starter homes as part of the market housing share allowed by the policy where necessary to ensure the viability of the scheme.</u>
HOU5	Policy amended for clarity.	IV. Applications for the removal of an occupancy condition related to rural workers will only be permitted in exceptional circumstances where it can be demonstrated that: (a) There is no longer a need for the accommodation <u>for agricultural, forestry or other rural workers</u> on the holding/business and in the local area;
13.8.1	Paragraph wording amended for clarity.	National policy requires local authorities to meet the specific accommodation needs of older and vulnerable people. It is important that the Council, working with partners such as the County Council, Registered Providers, health care agencies, and developers, seeks to plan for increasing housing choices in terms of specialist accommodation <u>for older and vulnerable people</u> , and appropriate dwellings that are in locations close to sustainable transport options and other key local services. In addition, o Offering attractive alternative housing choices for older people and vulnerable groups will assist in freeing-up family sized homes that are currently under-occupied.
13.8.2	Paragraph wording amended for clarity.	There is, therefore, a need in the District to provide suitable accommodation for various groups of people, including the elderly, people with disabilities and vulnerable people. <u>This covers a range of housing types, from accessible and adaptable general needs housing to the full range of retirement and specialised housing for those with support or care needs.</u>
13.8.3	Paragraph wording amended to reflect Government guidance and to provide clarity.	<u>The Government's reform of Health and Adult Social Care is underpinned by a principle of sustaining people at home as long as possible. Therefore,</u> A accommodation for the elderly is moving towards more flexible forms of living and support, which seek to maintain their <u>people's</u> independence. There are several options where residents can enjoy their own self-contained home within a site offering extra facilities. These include retirement homes, and 'extra care' housing, where varying levels of care and support are provided within the home. Other forms of accommodation include residential care or nursing homes.

New 13.8.4	New paragraph setting out the Council's approach to the provision of housing suitable for older and vulnerable people within the C3 Use Class.	<u>The Council will require that all development schemes provide accessible and adaptable homes to meet the changing needs of occupants over their lifetime, and will encourage the provision of specialist types of retirement housing (within the C3 Use Class), such as sheltered housing and flexi-care housing, as part of the development of larger sites. Consideration should also be given to the provision of bungalows which have been identified as a preferred housing type by many older people in the District.</u>
New 13.8.5	New paragraph setting out the evidence for specialist residential or nursing care accommodation within the C2 Use Class, as identified in the latest SHMA (2015).	<u>People who are unable to live independently require specialist residential or nursing care accommodation. This type of accommodation usually falls within the C2 Use Class. It is important to note that the objectively assessed housing need (OAN) for the District does not include the projected increase of the institutional population. The SHMA (2015) identifies the projected growth in population aged 75 or over living in communal establishments in the District, as 529 persons, between 2011-2033.</u>
New 13.8.6	New paragraph setting out the requirement for specialist residential or nursing care accommodation within the C2 Use Class, as identified in the latest SHMA (2015).	<u>Therefore, in addition to the overall housing target, this Plan supports a gross increase of at least 530 bed-spaces of C2 provision, primarily to help meet the accommodation needs of older people who need to live in an environment which provides residential or nursing care. However, other people including young people, people with physical disabilities or sensory needs, people with learning difficulties and other vulnerable people may also require specialist accommodation.</u>
13.8.4 (now 13.8.7)	Paragraph amended for clarity.	<u>Specialist types of retirement housing and specialist residential and nursing care accommodation</u> Residential care accommodation should normally be located within settlements where there is easy access to a range of services e.g. shops, healthcare facilities, and social facilities, and sustainable transport options.
New 13.8.8	New paragraph justifying the Council's decision to incorporate the optional 'Building Regulations' standards relating to accessible and adaptable dwellings into planning policy.	<u>As people's housing needs change over their lifetimes, it is important to promote the construction of flexible, adaptable and accessible homes that can respond to the changing needs of individuals and families at different stages of life at minimal cost. Therefore, it makes practical, social and economic sense to incorporate accessible and adaptable design features from the outset, at the start of a building's life, to help people remain independent in their own homes and enjoy a good quality of life.</u>
New 13.8.9	New paragraph setting out the Government guidance on the new 'optional' Building Regulations standards.	<u>In 2015, the Government introduced new 'optional' Building Regulations standards relating to accessible and adaptable dwellings and wheelchair user or wheelchair adaptable dwellings (Requirement M4(2) (accessible and adaptable dwellings) and M4(3) (wheelchair user dwellings). These optional requirements can only be secured through planning policy, and Planning Practice Guidance states that local authorities should identify the proportion of</u>

		<u> dwellings in new developments that should comply with the requirement in their Local Plan.</u>
New 13.8.10	New paragraph setting out the requirement for the provision of dwellings that meet the Category 2 and Category 3 requirements as set out in Building Regulations, as identified in the latest SHMA (2015).	<u>The SHMA (2015) identifies that evidence supports the need for all new dwellings to meet Category 2 requirements (accessible and adaptable dwellings), and the need for 10% of market housing and 15% of affordable housing to meet Category 3 requirements (wheelchair user dwellings), provided that the overall viability of a development scheme is not compromised.</u>
New 13.8.11	New paragraph setting out the requirement for the provision of dwellings that meet the Category 2 and Category 3 requirements as set out in Building Regulations, as identified in the latest SHMA (2015).	<u>Part M of the Building Regulations sets a distinction between wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) and wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) dwellings. Planning Practice Guidance states that a policy requiring wheelchair accessible dwellings should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. Therefore, the Council will negotiate a proportion of wheelchair adaptable (market and affordable housing) and/or wheelchair accessible (affordable housing only) dwellings on sites proposing 11 or more additional dwellings, as appropriate.</u>
HOU6 -Title	Policy title amended for clarity.	Policy HOU6 <u>Specialist</u> Housing for Older and Vulnerable People
HOU6 – Part I.	Policy wording amended for clarity.	I. <u>The Council will encourage the provision of specialist housing, across all tenures, for older and vulnerable people.</u> Proposals for new housing for older and vulnerable people will be expected to:
HOU6 – Part I.	Criterion (a) of policy deleted as issue is now addressed through new policy HOU7 Accessible & Adaptable Homes.	a) Offer a flexible approach, incorporating ‘Lifetime Homes’ standards and be capable of being readily adapted to meet the needs of those with disabilities and the elderly. A percentage of new specialist accommodation will be expected to be fully wheelchair accessible;
HOU6 – Part II.	Policy wording deleted and criterion added to Part I. of policy.	II. — Such proposals will be expected to be:
HOU6 – Part II. (now Part I.)	Policy wording amended for clarity.	(e) <u>Be Well</u> integrated with existing communities through the sharing of space and public access to services <u>where appropriate</u> ;
HOU6 – Part II. (now Part I.)	Criterion (d) of policy deleted as design issues are addressed through new Policy DES3.	(d) Of a non-institutional, safe and stimulating design, which meets not only the needs of its future residents but also the staff who work there and the visitors who may use it as a community resource.

HOU6 – Part I.	New criterion (e) added to policy to ensure that the integration of healthcare facilities is considered as part of development proposals.	<u>(e) Consider the integration of healthcare facilities within the development.</u>
HOU6 – New Part II.	New policy wording added setting out the requirement for specialist residential or nursing care accommodation within the C2 Use Class, as identified in the latest SHMA (2015).	II. <u>In addition to the overall housing target, a gross increase of at least 530 bed-spaces to help meet the accommodation needs of those who need specialist (Use Class C2) residential or nursing care will be supported in the District's towns.</u>
New Policy HOU7	New policy added requiring the provision of accessible and adaptable homes to ensure the changing needs of occupants are met over their lifetimes.	<p><u>Policy HOU7 Accessible and Adaptable Homes</u></p> <p>I. <u>In order to ensure delivery of new homes that are readily accessible and adaptable to meet the changing needs of occupants, and to support independent living, the Council will require that:</u></p> <p>(a) <u>all new residential development should meet the Building Regulations Requirement M4(2): Category 2 – Accessible and Adaptable Dwellings; and</u></p> <p>(b) <u>on sites proposing 11 or more gross additional dwellings, a proportion of dwellings will be expected to meet the Building Regulations Requirement M4(3): Category 3 – Wheelchair User Dwellings, where appropriate.</u></p> <p>II. <u>Only where circumstances exist where it can be demonstrated by the applicant that it is not practically achievable or financially viable to deliver this policy, will new development be exempt from the requirement.</u></p>
New Section 13.9	New section added to reflect the duties placed on the Council by the Self-Build and Custom Housebuilding Act 2015.	<p><u>13.9 Self-Build and Custom Build Housing</u></p> <p><u>13.9.1 Self-Build or Custom Build housing is housing built or commissioned by individuals (or groups of individuals) to be occupied by themselves as their sole or main residence. For the purposes of planning policy, self-build and custom build dwellings share the same definition and the terms are used interchangeably. Self-build is where a person is directly involved in organising and constructing their home, whereas custom build is where a person commissions a specialist developer to help to deliver their own home. Both routes require significant input from the home owner in the design process of the dwelling.</u></p>

		<p><u>13.9.2 The Self-Build and Custom Housebuilding Act 2015 places a duty on local authorities to keep and have regard to a register of people who are interested in self-build or custom build projects in their area. In addition, local authorities are required to grant sufficient suitable development permissions on serviced plots of land to meet the demand, as evidenced by the number of people on the register, for self-build and custom build plots in their area.</u></p> <p><u>13.9.3 The Council considers that self-build and custom build housing can play an important part in contributing to the supply of housing, increasing the mix of housing types and tenures, and have the potential to increase the delivery of innovative and highly sustainable developments in a cost effective manner.</u></p> <p><u>13.9.4 Therefore, to support prospective self-builders, developers of sites proposing 200 or more dwellings, will be expected to supply a proportion of serviced dwelling plots for sale to self-builders.</u></p> <p><u>13.9.5 The Localism Act 2011 provides communities with the opportunity to encourage self-build and custom build housing by creating planning policies or allocating new development sites in their area. The Council will support locally proposed self-build projects identified within a Neighbourhood Plan wherever possible.</u></p>
New Policy HOU8 Self-Build Housing	New policy added to reflect the duties placed on the Council by the Self-Build and Custom Housebuilding Act 2015.	<p><u>Policy HOU8 Self-Build Housing</u></p> <p>I. <u>To support prospective self builders, on sites of more than 200 dwellings, developers will be expected to supply 5% of dwelling plots for sale to self builders, having regard to the need identified on the Council's Self-Build and Custom Build Register.</u></p> <p>II. <u>The Council will support locally proposed self-build projects identified within a Neighbourhood Plan wherever possible.</u></p> <p>III. <u>Planning permissions should include conditions requiring self-build developments to be completed within 3 years of a self-builder purchasing a plot.</u></p> <p>IV. <u>Where plots have been made available and marketed</u></p>

		<u>appropriately for at least 12 months and have not sold out, the plot(s) may either remain on the open market as self-build or be built out by the developer.</u>
13.9.1 (now 13.10.1)	Paragraph amended to improve grammar and delete unnecessary text.	In addition to meeting the needs of the settled population, national policy requires that local planning authorities make provision for Gypsies and Travellers and Travelling Showpeople, within their local plans, by setting respective pitch and plot targets to meet likely permanent and transit site accommodation needs in their area. Guidance is clear that Plans are likely to be found unsound if proper provision, which should be based on robust evidence of local need, is not made.
Box below 13.9.1 (now 13.10.1)	Wording updated to reflect publication of updated version of 'Planning policy for traveller sites', August 2015.	The national approach to planning for the needs of Gypsies and Travellers and Travelling Showpeople is set out in 'Planning policy for traveller sites' DCLG, March 2012 <u>August 2015</u> . This can be viewed and downloaded from the Government's publications website at: www.gov.uk/government/publications/planning-policy-for-traveller-sites A definition of Gypsies and Travellers and Travelling Showpeople <u>for planning policy purposes</u> is contained in Annex 1 of this document.
13.9.3 (now 13.10.3)	Paragraph updated to reflect permissions on individual sites rather than stating how many pitches have been provided to date, as that position may change prior to Examination in cases (making the text inaccurate) where currently not all permissions have been fully implemented.	There are currently three authorised private Gypsy and Traveller sites in East Herts: <ul style="list-style-type: none"> • Nine Acres, High Cross: 2 <u>8 permitted</u> pitches (with planning permission for an additional 6 pitches); • Field Farm, Levens Green: 4 <u>6 permitted</u> pitches (with planning permission for an additional 2 pitches); and • The Stables, Bayfordbury: 5 <u>8 permitted</u> pitches (with planning permission for an additional 3 pitches).
13.9.5 (now 13.10.5)	Paragraph updated to reflect the findings of the Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016.	The Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment, 201x, identified that xx permanent pitches and xx transit pitches for Gypsies and Travellers and xx plots for Travelling Showpeople should be provided in the district for the period up to 201x with a further xx permanent pitches and xx transit pitches for Gypsies and Travellers and xx plots for Travelling Showpeople for the period from 201x up to 20xx <u>The Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016, identified that 5 permanent pitches for Gypsies and Travellers and 9 plots for Travelling Showpeople should be</u>

		<u>provided in the District for the period up to 2033.</u>
13.9.6 (now 13.10.6)	Paragraph updated to reflect the findings of the Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016.	<p>The Gypsies and Travellers Identification of Potential Sites Study, 201x, made recommendations on locations within which the need identified in the Gypsies and Travellers and Travelling Showpeople's Accommodation Needs Assessment could be met. <u>For Gypsies and Travellers, 2 pitches will be required up to 2022, with a further 3 pitches between 2022-2027. These pitch requirements arise from two sites at:</u></p> <ul style="list-style-type: none"> • <u>The Stables, Bayford (3 pitches), which will be met via expansion of that site; and</u> • <u>Unauthorised pitches at Esbies, Sawbridgeworth (2 pitches), which will be met within a new site for 15 pitches to be established within Birchall Garden Suburb, which will also contribute to meeting the needs of Welwyn Hatfield Borough.</u>
New 13.9.7 (now 13.10.7)	New paragraph to explain approach to meeting Gypsy and Traveller accommodation needs towards the end of the plan period.	<u>As the identification of accommodation needs for Gypsies and Travellers is less certain beyond year 10 of the plan, and an up-to-date understanding of the needs of Gypsy and Traveller communities will need to be maintained throughout the plan period, it is considered appropriate that provision should not be specifically allocated post-2027 without a demonstration of precise need at this time. However, in anticipation of future accommodation needs occurring, an additional Gypsy and Traveller site should be identified within the Gilston Area site allocation for future need towards the end of the plan period and/or beyond. Land should be safeguarded as part of the overall development of the site for such purposes.</u>
New 13.10.8	New paragraph to explain the identified accommodation needs of Travelling Showpeople to be met across the plan period.	<u>For Travelling Showpeople, 7 plots will be required up to 2022; one plot is required between 2022 and 2027; and a further plot between 2027 and 2033 (totalling 9 plots across the plan period). All of these plot requirements arise from the Rye House site, which is fully occupied with no room for expansion. A new yard should be identified within Gresley Park to provide 5 plots towards meeting the needs of the first five years; and 4 plots should also be allocated within the development to the North and East of Ware to meet the residual need across the plan period. In order to ensure that any, as yet unidentified, Travelling Showpeople's needs can be accommodated the allocated site to the North and East of Ware should also include sufficient safeguarded land for future expansion within a site area large enough to accommodate a total of 8 plots overall, as need dictates. Additionally, the Gilston Area should also include sufficient safeguarded land for future longer term provision within a</u>

		<p><u>site area large enough to accommodate a total of 8 plots overall.</u></p>												
<p>HOU7 (now HOU9) (I)</p>	<p>Policy updated to reflect findings of the Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016 and to provide specific pitch and plot allocations across the plan period.</p>	<p>Policy HOU79 Gypsies and Travellers and Travelling Showpeople</p> <p>I. To meet the identified need, xx pitches for Gypsies and Travellers and xx plots for Travelling Showpeople will be provided within the District at the following locations:</p> <p>Dependent on outcome of two shortly to be commissioned studies: Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment, and Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study.</p> <p>To be shown in form of table with phasing.</p> <table border="1" data-bbox="1644 804 2674 1854"> <tr> <td colspan="2" data-bbox="1644 804 2674 846"><u>Gypsy and Travellers:</u></td> </tr> <tr> <td data-bbox="1644 846 2131 1003"><u>The Stables, Bayford</u></td> <td data-bbox="2131 846 2674 1003"><u>3 pitches (2 to be provided in the period up to 2022; and 1 between 2022 and 2027) within the allocated site area.</u></td> </tr> <tr> <td data-bbox="1644 1003 2131 1371"><u>Birchall Garden Suburb, East of Welwyn Garden City</u></td> <td data-bbox="2131 1003 2674 1371"><u>4 pitches (to be provided between 2022 and 2027) within an area sufficient to accommodate a total of 15 pitches to meet the accommodation needs of both East Herts and Welwyn Hatfield and/or for future expansion, as evidence of need dictates.</u></td> </tr> <tr> <td data-bbox="1644 1371 2131 1738"><u>The Gilston Area</u></td> <td data-bbox="2131 1371 2674 1738"><u>To allow for longer-term accommodation needs, an area of suitable land should be safeguarded that would allow for future provision of a total of 15 pitches, to be delivered towards the end of the Plan period and/or beyond, as evidence of need dictates.</u></td> </tr> <tr> <td colspan="2" data-bbox="1644 1738 2674 1780"><u>Travelling Showpeople:</u></td> </tr> <tr> <td data-bbox="1644 1780 2131 1854"><u>Gresley Park, East of</u></td> <td data-bbox="2131 1780 2674 1854"><u>5 plots (each of sufficient size to</u></td> </tr> </table>	<u>Gypsy and Travellers:</u>		<u>The Stables, Bayford</u>	<u>3 pitches (2 to be provided in the period up to 2022; and 1 between 2022 and 2027) within the allocated site area.</u>	<u>Birchall Garden Suburb, East of Welwyn Garden City</u>	<u>4 pitches (to be provided between 2022 and 2027) within an area sufficient to accommodate a total of 15 pitches to meet the accommodation needs of both East Herts and Welwyn Hatfield and/or for future expansion, as evidence of need dictates.</u>	<u>The Gilston Area</u>	<u>To allow for longer-term accommodation needs, an area of suitable land should be safeguarded that would allow for future provision of a total of 15 pitches, to be delivered towards the end of the Plan period and/or beyond, as evidence of need dictates.</u>	<u>Travelling Showpeople:</u>		<u>Gresley Park, East of</u>	<u>5 plots (each of sufficient size to</u>
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<u>Travelling Showpeople:</u>														
<u>Gresley Park, East of</u>	<u>5 plots (each of sufficient size to</u>													

			<p><u>Stevenage</u></p> <p><u>allow for the provision of accommodation and equipment plus storage/maintenance).</u></p> <p><u>North and East of Ware</u></p> <p><u>4 plots (each of sufficient size to allow for the provision of accommodation and equipment plus storage/maintenance) within the first phase of development to be provided within a larger area that should be safeguarded to allow for future expansion to a total of 8 plots, as evidence of need dictates.</u></p> <p><u>The Gilston Area</u></p> <p><u>To allow for longer-term accommodation needs, an area of suitable land should be safeguarded that would allow for future provision of a total of 8 plots (each of sufficient size to allow for the provision of accommodation and equipment plus storage/maintenance), to be delivered towards the end of the Plan period and/or beyond, as evidence of need dictates.</u></p>
HOU7 (now HOU9) II (c)	Insertion of 'or plots' to make it clear that the policy applies to applications for both Gypsies and Travellers and Travelling Showpeople's accommodation.	(c) proposals make adequate provision for on-site facilities for storage, play, residential amenity and sufficient on-site utility services for the number of pitches <u>or plots</u> proposed;	
HOU7 (now HOU9) III	Insertion of 'additionally' for clarity so that it is apparent that the criteria at II. also apply.	Proposals for sites accommodating Travelling Showpeople should <u>additionally</u> allow for a mixed use yard with areas for residential provision and the storage and maintenance of equipment. All other proposals for mixed residential and business activities will be assessed on a site specific basis, taking the above criteria into account.	
New Section 13.11	New section added to address the accommodation needs of non-nomadic Gypsies and Travellers and Travelling Showpeople.	<p><u>13.11 New Park Home Sites for Non-Nomadic Gypsies and Travellers and Travelling Showpeople</u></p> <p><u>13.11.1 The NPPF makes it clear that local planning authorities should consider the Government's 'Planning policy for traveller sites' (PPTS), in</u></p>	

		<p><u>conjunction with the NPPF, when preparing plans or making decisions on travellers sites in their area. PPTS identifies a definition distinction that Gypsies and Travellers who no longer lead a nomadic lifestyle are treated as non-travelling Gypsies and Travellers for the purposes of the planning system and their needs must therefore be met by the requirements of the NPPF. However, the Human Rights Act 1998 and the Equalities Act 2010 protect their cultural choice to live in mobile accommodation and therefore there is a need to plan for park homes within the Plan.</u></p> <p><u>13.11.2 The Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016, identified ten Gypsy and Traveller households and 16 Travelling Showpeople households who do not meet the PPTS definition. While the accommodation needs of these households has yet to be fully determined, provision will be met through the application of HOU1 and through the consideration of any other applications submitted, in accordance with the following policy.</u></p>
<p>New Policy HOU10 New Park Home Sites for Non-Nomadic Gypsies and Travellers and Travelling Showpeople</p>	<p>New section added to address the accommodation needs of non-nomadic Gypsies and Travellers and Travelling Showpeople.</p>	<p><u>Policy HOU10 New Park Home Sites for Non-Nomadic Gypsies and Travellers and Travelling Showpeople</u></p> <p><u>I. Any applications for planning permission for Gypsy and Traveller and Travelling Showpeople park homes must be in accordance with the NPPF and PPTS and the following criteria should be satisfied:</u></p> <p><u>(a) the site is in a sustainable location in terms of accessibility to existing local services;</u></p> <p><u>(b) the site is suitable in terms of vehicular access to the highway, parking, turning, road safety and servicing arrangements and has access to essential services such as water supply, sewerage, drainage, and waste disposal;</u></p> <p><u>(c) proposals make adequate provision for on-site facilities for storage, play, residential amenity and sufficient on-site utility services for the number of park homes proposed;</u></p> <p><u>(d) the proposal is well related to the size and location of the site and respects the scale of the nearest settled community;</u></p> <p><u>(e) the site can be integrated into the local area to allow for successful</u></p>

		<p><u>co-existence between the site and the settled community;</u></p> <p><u>(f) proposals provide for satisfactory residential amenity both within the site and with neighbouring occupiers and thereby do not detrimentally affect the amenity of local residents by reason of on-site business activities, noise, disturbance, or loss of privacy;</u></p> <p><u>(g) proposals ensure that the occupation and use of the site would not cause undue harm to the visual amenity and character of the area and should be capable of being assimilated into the surrounding landscape without significant adverse effect;</u></p> <p><u>(h) the site is not affected by environmental hazards that may affect the residents' health or welfare or be located in an area of high risk of flooding, including functional floodplains;</u></p> <p><u>(i) within nationally recognised designations, proposals would not compromise the objectives of the designation.</u></p> <p><u>II. New traveller sites (whether temporary or permanent) in the Green Belt are inappropriate development and will not be approved except in very special circumstances.</u></p>
13.10.1 (now 13.12.1)	Paragraph wording amended for clarity.	The replacement of buildings on a one-to one basis can be a means of securing more functional buildings to meet present and future needs. The Council is <u>committed to maintaining the character and appearance of the District</u> anxious that the character of the District is maintained . Proposals for a replacement building should be in the same use and not be materially larger that <u>than</u> the one it replaces.
13.10.1 (now 13.12.1)	Correction.	The replacement of buildings on a one-to one basis can be a means of securing more functional buildings to meet present and future needs. The Council is anxious that the character of the District is maintained. Proposals for a replacement building should be in the same use and not be materially larger that <u>than</u> the one it replaces.
13.11.2 (now 13.13.2)	Paragraph wording amended to reflect amendment to Policy Number and title from DES1 to DES3.	The Council will expect all proposals for extensions and alterations to dwellings and residential outbuildings to be of a high standard of design that is appropriate to the character and appearance of the dwelling and the surrounding area. All householder development proposals should be

		sensitively designed to ensure that they would not have an unacceptable impact upon the amenities of the occupiers of the existing dwelling and any neighbouring dwellings. In particular the Council will assess proposals having regard to any loss of light, privacy and outlook and overbearing impacts that the development could have upon existing and future occupiers of the host dwelling and adjoining dwellings. In addition to the policies below, applications for extensions will also be considered against Policy DES1 DES3 (Local Character and Amenity Design of Development) where appropriate.
HOU9	Policy deleted and elements of policy wording added to Policy HOU11 (formerly HOU10) and GBR2.	<p>Policy HOU9 Extensions to Dwellings</p> <p>I. Planning permission will be granted for extensions to existing dwellings, provided that the character and appearance of the dwelling and surrounding area, and the amenities of the current and future occupiers of the dwelling and any adjoining dwellings would not be significantly affected to their detriment.</p> <p>II. Within the Green Belt and Rural Area Beyond the Green Belt in addition to the above, planning permission will be granted for extensions to existing dwellings provided that they do not result in disproportionate additions over and above the size of the original dwelling (including existing outbuildings) nor intrude into the openness of the site and the surrounding area.</p> <p>III. All proposals will be considered against the criteria set out in Policy HOU10 (Extensions and Alterations to Dwellings and their Curtilage).</p>
HOU10 (now HOU11)	Policy amended for clarity and to incorporate elements of policy wording from deleted policies HOU9 (Extensions to Dwellings) and HOU11 (Residential Outbuildings).	<p>Policy HOU11 Extensions and Alterations to Dwellings, Residential Outbuildings and Works Within their Residential Curtilages</p> <p>Proposals for:</p> <ul style="list-style-type: none"> • extensions and alterations to dwellings; • residential outbuildings or extensions to existing outbuildings; and • works within their residential curtilages. <p>will be considered in accordance with Policies GBR1 and GBR2, Policy HOU9 (Extensions to Dwellings) and against the following criteria:</p> <p>(a) proposed extensions or alterations to dwellings should be of a size, scale, mass, form, siting, design and materials of construction that are appropriate to the character, appearance and setting of the existing</p>

		<p>dwelling and/or the surrounding area, and extensions should generally appear as a subservient addition to the dwelling;</p> <p>(b) side extensions at first floor level or above should ensure appropriate space is left between the flank wall of the extension and the common curtilage with a neighbouring property (as a general rule a space of 1 metre will be the minimum acceptable), to safeguard the character and appearance of the street scene and prevent a visually damaging 'terracing' effect;</p> <p>(c) flat roofed extensions, except those on the ground floor, will be refused as visually undesirable other than in those exceptional circumstances where the character of the original dwelling allows a flat-roofed design to be appropriately incorporated, <u>or it represents a sustainable or innovative design approach</u>;</p> <p>(d) roof dormers may be acceptable if appropriate to the design and character of the original dwelling and its surroundings. Dormers should generally be of limited extent and modest proportions, so as not to dominate the existing roof form.</p>
HOU11	Policy deleted and elements of policy wording added to Policy HOU11 (formerly HOU10) and GBR2.	<p>Policy HOU11 deleted</p> <p>Policy HOU11 Residential Outbuildings</p> <p>Proposals for residential outbuildings or extensions to existing outbuildings will be considered against the following criteria:</p> <p>(a) where located within the Green Belt and Rural Area Beyond the Green Belt, proposals for residential outbuildings should not result in disproportionate additions over and above the size of the original dwelling (including existing outbuildings) nor intrude into the openness of the site and the surrounding area;</p> <p>(b) be of an appropriate size, scale, mass, form, siting, design and materials of construction such that the character and appearance of the site and its surroundings, and the amenities of the current and future occupiers of the dwelling and any adjoining dwellings would not be significantly affected to their detriment.</p>

<p>HOU13</p>	<p>Policy amended for clarity</p>	<p>Amendment to Policy HOU13:</p> <p>I. Residential annexes will be permitted where:</p> <p>(a) the accommodation forms an extension to the main dwelling and is capable of being used as an integral part of the dwelling or forms a separate outbuilding which is close to and well related to <u>and have a clear functional link to</u> the main dwelling;</p> <p>(b) the scale of the annexe does not dominate the existing dwelling and is the minimum level of accommodation required to support the needs of the occupant;</p> <p>(c) sufficient space to park vehicles for both parts of the dwelling, in accordance with adopted standards, is available and appropriately located in design terms within the curtilage;</p> <p>(d) the development accords with <u>Policyies HOU9 (Extensions to Dwellings) HOU11 (Extensions and Alterations to Dwellings, Residential Outbuildings and Works within Residential Curtilages) and HOU12 (Residential Outbuildings).</u></p> <p>II. Where planning permission is granted for a residential annexe, planning conditions may be imposed to ensure that the occupation of the annexe remains tied to the main dwelling.</p>
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ESSENTIAL REFERENCE PAPER 'C'

13 Housing (*To be renumbered Chapter 14*)

13.1 Introduction

13.1.1 A key objective of the District Plan seeks to ensure that new housing is accessible to, and meets the needs and aspirations of, the District's communities. The Council also recognises that everyone should be given the opportunity to access a decent home, which they can afford and is in a community where they want to live. The Plan can contribute to achieving these objectives by planning for a sufficient quantity, quality and type of housing in the right locations, taking account of need and demand and seeking to improve choice.

13.1.2 This chapter sets out the Council's approach to addressing the need for different types of housing within the District up to 2033. It includes policies relating to the type, mix and density of new housing, affordable housing, and Gypsies, Travellers and Travelling Showpeople housing requirements.

13.2 Type and Mix of Housing

13.2.1 The National Planning Policy Framework (NPPF) states in paragraph 47 that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. Paragraph 50 states that local planning authorities should plan for a mix of housing, based on current and demographic trends, market trends and the needs of different groups in the community. It goes on to say that local planning authorities should identify the size, type, tenure and range of housing that is required in different locations.

13.2.2 Developers are encouraged to discuss with the Council the appropriate mix of house size, type and tenure within any new housing development at an early stage in the pre-application process. Requirements will be informed by the following, along with any additional up-to-date evidence:

- The West Essex and East Hertfordshire Strategic Housing Market Assessment (SHMA) (2015);
- The Older People's Housing Requirements Technical Study (2013);
- The latest East Herts Housing Strategy;
- Local demographic context and trends;
- Local housing need and demand;
- Site issues and design considerations.

13.2.3 The SHMA (2015) sets out the mix of market and affordable housing need in the District by dwelling type and size over the period 2011-2033.

Table 13.1 Market and Affordable Housing Mix 2011-2033

Market Housing		Number	%
Flat	1 bedroom	710	6%
	2+ bedrooms	810	7%
House	2 bedrooms	1510	12%
	3 bedrooms	5640	46%
	4 bedrooms	2740	23%
	5+ bedrooms	770	6%
Total Market Housing		12,200	
Affordable Housing			
Flat	1 bedroom	820	19%
	2+ bedrooms	470	11%
House	2 bedrooms	1210	29%
	3 bedrooms	1410	34%
	4+ bedrooms	310	7%
Total Affordable Housing		4,200	

The West Essex and East Hertfordshire Strategic Housing Market Assessment (2015) can be viewed and downloaded from the Council's Website at: www.eastherts.gov.uk/shma

The London Commuter Belt (East) Sub-Region: Older People's Housing Requirements Study (October 2013) can be viewed and downloaded from the Council's Website at: www.eastherts.gov.uk/olderpeoplestudy

The Council's latest Housing Strategy can be viewed and downloaded

- 13.2.4 Another key issue for East Herts is its ageing population. ONS population forecasts show that there will be 87.5% more older people (65+) by 2037. The largest increase within the 65+ group are those aged over 85, a 189.6% increase, which potentially means a significant increase in the need for support services and housing with support. It is therefore important that the District Plan takes a positive approach to planning ahead for the housing issues that will arise from the ageing population.

Policy HOU1 Type and Mix of Housing

- I. On new housing developments of 5 or more gross additional dwellings, an appropriate mix of housing tenures, types and sizes will be expected in order to create mixed and balanced communities appropriate to local character and taking account of the latest Strategic Housing Market Assessment and any additional up-to-date evidence.
- II. Affordable Housing should be provided in accordance with Policy HOU3 (Affordable Housing).
- III. Where appropriate, provision of specialist housing will be encouraged for older people and vulnerable groups in accordance with Policy HOU6 (Specialist Housing for Older and Vulnerable People).
- IV. Provision of accessible and adaptable dwellings to meet the changing needs of occupants over their lifetime should be provided in accordance with Policy HOU7 (Accessible and Adaptable Homes).
- V. Self-Build Housing in accordance with Policy HOU8 (Self-Build Housing)
- VI. Where appropriate, provision of specialist accommodation will be expected for Gypsies and Travellers and Travelling Showpeople and Non-Nomadic Gypsies and Travellers and Travelling Showpeople, in accordance with Policies HOU9 (Gypsies and Travellers and Travelling Showpeople) and HOU10 (New Park Home Sites for Non-Nomadic Gypsies and Travellers and

13.3 Housing Density

- 13.3.1 Housing density is a measure of the amount of land used for development and is usually expressed as dwellings per hectare (dph). Higher densities allow land to be used more efficiently (i.e. less land is required for development) and are considered to be more sustainable. However, since higher density development is usually associated with flats and taller buildings, the impact of increasing densities on character must be considered.
- 13.3.2 The NPPF allows local planning authorities to set their own approach to housing density. The density of housing varies across the District, and between different sites. Factors affecting density include on-site constraints, the type of development proposed and the level of transport accessibility. Higher densities may be appropriate in and around town centre locations where services are supported, public transport is likely to be better and urban form is dense. Lower densities may be appropriate in established suburban areas, in villages, in areas with an open character or on the edge of settlements.
- 13.3.3 The Council will expect all housing schemes to propose densities which are sensitive to the character of the local area, and take account of on-site constraints and the availability of sustainable transport options.. At the same time, applicants should also have regard to making efficient use of land, as this can help to reduce the amount of building on greenfield sites. Major schemes should include a range of housing density areas, to ensure varied character and appearance.
- 13.3.4 The density standards used in Policy HOU2 refer to average net density. This is a normal way of expressing residential density and includes those areas which will be developed for housing and directly associated uses such as access roads within the site, private garden space, car parking, incidental open space and landscaping, and children's play areas.

Policy HOU2 Housing Density

- I. Housing development should make efficient use of land. Proposals are required to demonstrate how the density of new development has been informed by the character of the local area and contributes to:
 - (a) The design objectives set out in Policy DES3 (Design of Development);
 - (b) Improving the mix of house types in accordance with Policy HOU1 (Type and Mix of Housing); and
 - (c) Providing adequate levels of public open space in accordance with Policy CFLR1 (Open Space, Sport and Recreation); and
 - (d) Retaining existing site features, including mature trees, shrubs, hedgerows and amenity areas, and make provision for new green infrastructure in accordance with Policy NE4 (Green Infrastructure).
- II. Subject to the above, densities will vary according to the relative accessibility and character of locations. Higher net densities will be favourably considered on central sites in or near town centres and where the character of the surroundings allows.
- III. Medium net densities will normally be appropriate for sites that are in more peripheral locations within and on the edge of these settlements.
- IV. In villages and for some other locations lower net densities may be more appropriate to respond to local character and context.

13.4 Affordability and the Housing Market

- 13.4.1 The location of East Herts on the periphery of London means that the affordability of housing is a key issue across the District.

13.4.2 Affordable housing is housing provided at a cost below current market rates to eligible households, whose needs are not adequately served by the commercial housing market. For planning purposes, affordable housing has a specific definition as set by the NPPF and is currently defined as social rented, affordable rented and intermediate housing. However, the Housing and Planning Act 2016 inserts a new affordable housing definition into the Town and Country Planning Act 1990, which will, once enacted through secondary legislation, amend the definition of affordable housing to include starter homes.

13.4.3 There is a significant need for additional affordable housing within East Herts as set out in the latest Strategic Housing Market Assessment (SHMA) 2015. The table below sets out the current unmet need for affordable housing in the District, together with the projected future affordable need for the 22-year period 2011-2033:

Table 13.2 Affordable Housing Need

	Affordable Housing Need (Households)
Unmet need for affordable housing in 2011	
Total unmet need for affordable housing	1,632
Supply of housing vacated	471
Current affordable housing need	1,161
Future need for affordable housing 2011-2033	2,967
Total need for affordable housing 2011-2033	4,128
% of overall housing need	31%

13.4.4 In order to deliver the identified need, Policy HOU3 requires the following:

(a) up to 35% affordable housing on sites proposing 11 to 14 gross additional dwellings;

(b) up to 40% affordable housing on sites proposing 15 or more gross additional dwellings, or 0.5 hectares or more in size.

13.4.5 Planning Practice Guidance states that affordable housing contributions should not be sought from sites proposing

development of 10 units or less and where the dwellings would have a combined gross internal floor space of 1,000 square metres or less. Therefore, the affordable housing requirement has not been set at 31% in recognition of the fact that not all developments will contribute to the provision of affordable housing.

13.4.6 The percentage of affordable housing provision that the Council will expect to secure from development schemes has been informed by development viability assessments. The aim is to maximise affordable housing provision and the viability assessments demonstrate that the targets of 35% and 40% as required in Policy HOU3, are viable for most developments in most locations across the District, and can be realistically achieved without constraining the overall delivery of housing.

The Delivery Study can be viewed and downloaded at:
www.eastherts.gov.uk/deliverystudy

13.4.7 Table 13.3 sets out the housing mix requirements in terms of property type (house or flat), size and affordable housing tenure.

Table 13.3 Affordable Housing Mix

Affordable Rent		
Flat	1 bedroom	720
	2+ bedrooms	400
House	2 bedrooms	1,020
	3 bedrooms	1,130
	4+ bedrooms	270
Subtotal		3,500
% of affordable housing		84%
Intermediate Affordable Housing		
Flat	1 bedroom	100
	2+ bedrooms	70
House	2 bedrooms	190
	3 bedrooms	280
	4+ bedrooms	40

Subtotal		700
% of affordable housing		16%

- 13.4.8 The Council secures the majority of affordable housing that is built in the District by requiring developers to provide affordable dwellings as part of open market housing developments (through Section 106 Agreements). Affordable housing is also delivered by Registered Providers (i.e. housing associations) on sites owned and/or developed by them, and on ‘exception sites’ as set out in Policy HOU4 below.
- 13.4.9 Effective affordable housing provision is not just about quantity; of equal importance is ensuring the right type of provision. The SHMA 2015 identifies the greatest need for affordable housing is from those requiring housing from the affordable rent tenure. However, the Housing and Planning Act 2016 has introduced the requirement for local authorities to promote the supply of starter homes. The Act sets out a definition of starter homes and signals the Government’s intention to require a set proportion of starter homes to be delivered on qualifying sites, the level of which will be confirmed by secondary legislation.
- 13.4.10 The Government’s ‘Starter Homes Technical Regulations’ consultation indicates the intention for starter homes to apply to sites proposing 10 dwellings or more (or over 0.5ha in size) and for a minimum level of provision of 20% to apply. The consultation also suggests that in cases where an adopted affordable housing policy seeks a requirement for affordable housing in excess of 20%, only in circumstances where the 20% starter homes requirement is firstly met can any remaining proportion of other affordable housing tenures be sought.
- 13.4.11 Policy HOU3, therefore, has to have regard to the provision of starter homes. As such, the policy sets out that affordable housing provision will be expected to incorporate a mix of tenures taking account of the Council’s most up to date evidence on housing need. The tenure mix will be negotiated by the Council on a site by site basis, having regard to the affordable housing products defined within the National Planning Policy Framework. However, due to the continuing

demonstrable need for affordable rented housing, as evidenced in the SHMA, the Council will seek to maximise provision of this tenure to ensure that the needs of those in most need of affordable housing are met.

- 13.4.12 The requirement for affordable housing extends to all types of residential development, including specialist accommodation, such as sheltered or 'extra care' housing for older people. Where such schemes provide accommodation that is self-contained and fall within the Use Class C3 (Dwelling Houses), affordable housing will be expected in accordance with Policy HOU3. Proposals which fall within the Use Class C2 (Residential Institutions), such as residential care and nursing homes, and do not provide self-contained accommodation or support independent living, will not be expected to contribute to the provision of affordable housing.
- 13.4.13 The Council recognises that in some cases there may be abnormal development costs which need to be considered. Applicants seeking to justify a lower proportion of affordable housing will be required to demonstrate why it is not economically viable to provide such housing in accordance with Policy HOU3.
- 13.4.14 Where the affordable housing policy would result in the requirement relating to part of a dwelling, the calculation will be rounded upwards for 0.5+ and downwards for less than 0.5. Where development involves the demolition of existing properties the amount of affordable housing will be calculated on the gross number of new dwellings to be provided.
- 13.4.15 In general affordable housing should be provided on the application site. Off-site provision or financial contributions in lieu will only be accepted in exceptional circumstances where agreed with the District Council. Applicants proposing off-site provision or financial contributions in lieu will be expected to provide justification as part of a planning application.
- 13.4.16 Wherever possible, the affordable houses should be integrated within the scheme through 'pepper-potting' rather

than concentrated in a particular area unless site specific considerations dictate otherwise. This does not necessarily mean that every second or third property should be affordable; rather the affordable housing should be distributed across the entire site in clusters appropriate to the size and scale of the development, as this ensures the best prospect of securing mixed, inclusive communities. The design and appearance of affordable housing should be indistinguishable from market units.

- 13.4.17 Further guidance on the Council's approach to affordable housing and the implementation of this policy will be provided in an updated 'Affordable Housing' Supplementary Planning Document.

The Affordable Housing and Lifetime Homes' (2008, or as amended) Supplementary Planning Document can be viewed and downloaded at: www.eastherts.gov.uk/affordablehousing

Policy HOU3 Affordable Housing

- I. Affordable housing provision will be expected on all development sites that propose development that falls within Class C3 (Dwelling Houses) as follows:
 - (a) up to 35% on sites proposing 10 or fewer gross additional dwellings, and where the dwellings would have a combined gross floor space greater than 1,000 square metres;
 - (b) up to 35% on sites proposing 11 to 14 gross additional dwellings;
 - (c) up to 40% on sites proposing 15 or more gross additional dwellings.
- II. Affordable Housing provision will be expected to incorporate a mix of tenures taking account of the Council's most up to date evidence on housing need. The Council will negotiate the tenure mix to be provided on a site, having regard to the affordable housing products defined within the National Planning Policy Framework, through the planning application process.

- III. Lower provision may be permitted if it is demonstrated that the 35% and 40%, as appropriate referred to in I (a), (b) and (c) above, cannot be achieved due to viability reasons or where it would prejudice the need to secure other infrastructure priorities. Applicants seeking to justify a lower percentage level of affordable housing to that referred to in I (a), (b) and (c) above, will be required to provide a financial viability assessment as part of the planning application. Where agreement is not reached, external independent consultants, agreed by both the Council and applicant, will be appointed by the developer, to undertake further independent viability assessment. The applicant will be required to meet the costs of this independent assessment.
- IV. Affordable Housing should normally be provided on site, apart from in exceptional circumstances when agreed with the Council. Applicants will be required to provide justification as part of the planning application setting out the need for off-site provision or financial contributions in lieu to be made.
- V. The affordable housing units should be integrated into the open market housing development using appropriate design methods, i.e. tenure blind, and 'pepper-potted' across the site in clusters appropriate to the size and scale of the development.
- VI. To secure the benefits of affordable housing for first and subsequent occupiers affordable rented and intermediate housing will be retained as affordable by means of an appropriate legal agreement or condition with the Council, or the subsidy will be recycled for alternative affordable housing provision.

13.5 Special Residential Uses

- 13.5.1 Applications for planning permission are sometimes received by the Council for a number of special residential uses, such as caravans, mobile homes, houseboats, and other residential institutions. All of these uses will be considered as though they were for a normal residential building and the policies relating to residential development will apply.

13.6 Rural Exception Sites

- 13.6.1 An exception site is one that would not usually secure planning permission for housing, for example agricultural land next to, but not within, a local settlement area.
- 13.6.2 It is important that rural exception affordable housing schemes are needs led, the starting point being that a need for affordable housing exists in the parish, rather than the availability of a particular site. Proposed developments must be based on sound evidence of affordable housing need and must fulfil the criteria as stated in the policy below.
- 13.6.3 The ability of the proposed scheme to meet identified local affordable housing needs must be clearly demonstrated to the satisfaction of the Council. This will be assessed using the Council's Housing Register and other available up-to-date housing needs assessments. It should also be demonstrated that the proposal is financially viable and deliverable.
- 13.6.4 While the whole of a rural exception scheme is normally expected to deliver 100% affordable housing, a small number of market homes may be permitted at the Council's discretion, where a viability assessment demonstrates that a cross subsidy is necessary to make the scheme viable. Any market housing provided will be expected to meet identified local housing needs.
- 13.6.5 Given that housing permitted through this policy is an exception to normal countryside policies, it is important that it remains 'affordable' in perpetuity. Only tenures which can be guaranteed to remain affordable in the long term will be permitted in such schemes.
- 13.6.6 Rural exception sites are not required to provide starter homes and the Council will not accept starter homes as part of the affordable housing provision on site. Consideration will however be given to the inclusion of starter homes as part of the market housing share allowed by the policy where necessary to ensure the viability of the scheme.

- 13.6.7 Localism will have an increasingly important influence on the shape of smaller rural settlements and the balance of rural housing stock. Parish Councils will be encouraged to identify sites in Neighbourhood Plans suitable for community-led affordable housing, including rural exception affordable housing sites which meet the criteria set out in the policy below.

Policy HOU4 Rural Exception Affordable Housing Sites

- I. Proposals for rural exception affordable housing schemes, on sites that would not normally be acceptable for general housing development, may be permitted, subject to the following criteria:
 - (a) The exception site is adjacent to an existing built-up area boundary, or is well related to existing residential development and amenities located in, or adjacent to, a clearly identifiable village or settlement;
 - (b) The proposed development will contribute towards meeting an identified need for affordable housing within the parish; and
 - (c) The proposed development would be appropriate to the settlement and area in which it is proposed to be located in terms of scale, form and character.
- II. The Council will base its assessment of identified housing need on the Housing Register and other available up-to-date housing needs assessments.
- III. A small number of market homes may be permitted, at the Council's discretion, where a viability assessment demonstrates that a cross subsidy is necessary to make the scheme viable. Any market housing provided will be expected to meet identified local needs.
- IV. Where permission is granted this will be subject to planning obligations and will include safeguards that the scheme provides for the identified local affordable housing need and will continue to do so in perpetuity.

13.7 Dwellings for Rural Workers

- 13.7.1 The accommodation needs of rural workers employed full-time in agriculture, forestry and other rural business can usually be met in existing properties either on the site or in nearby settlements. Occasionally it is essential for a worker to be in close proximity to the business and there is no suitable accommodation available nearby, for example, where animal or agricultural processes require essential care at short notice. These special circumstances may justify the construction of new dwellings in the countryside to meet these needs providing the financial and functional criteria in Policy HOU5 below are satisfied. Genuine essential need, rather than business convenience, must be justified.
- 13.7.2 Applications will be assessed taking account of the history of the enterprise, in order to establish whether existing dwellings within the site/holding or nearby could fulfil the need, or whether any dwellings or buildings suitable for conversion have been sold on the open housing market. Such a sale is likely to constitute lack of evidence of essential need.
- 13.7.3 New permanent dwellings can only be justified if the enterprise to which they relate is economically viable. For this reason, details of the financial situation of the business will be required.
- 13.7.4 Where planning permission is granted for a new dwelling on this basis, suitable occupancy conditions will be imposed. Proposals to remove an occupancy condition will only be considered on the basis of whether the need remains for the accommodation for other rural workers. This will involve marketing the property for a period of at least 12 months at a realistic price to reflect the occupancy condition. As part of this approach applicants will also need to demonstrate that the building cannot contribute to meeting local affordable housing needs in the area.

Policy HOU5 Dwellings for Rural Workers

- I. The Council will only permit permanent dwellings for agriculture, forestry and other rural businesses where:

(a) It can be demonstrated that the dwelling is essential to the needs of the business (i.e. there is a need for one or more workers to be available at most times);

(b) It can be demonstrated that the enterprise has been established for at least three years and is, and should remain financially viable;

(c) There is no other accommodation within the site/holding or in the locality which is currently suitable and available, or could be made available.

II. The proposed dwelling must be sensitively designed and in keeping with its rural surroundings.

III. Where a new dwelling is permitted, the occupancy will be restricted by condition to ensure that it is occupied by a person or persons currently employed, or last employed, in agriculture, forestry or other rural business, or a widow or widower of such a person, and to any residents dependants.

IV. Applications for the removal of an occupancy condition related to rural workers will only be permitted in exceptional circumstances where it can be demonstrated that:

(a) There is no longer a need for the accommodation for agricultural, forestry or other rural workers on the holding/business and in the local area;

(b) The dwelling has been marketed for a reasonable period (at least 12 months) and at a price which reflects the existence of the occupancy condition;

(c) The dwelling cannot make a contribution towards meeting local affordable housing needs in the area.

13.8 Housing for Older and Vulnerable People

13.8.1 National policy requires local authorities to meet the specific accommodation needs of older and vulnerable people. It is important that the Council, working with partners such as the

County Council, Registered Providers, health care agencies, and developers, seeks to plan for increasing housing choices in terms of specialist accommodation for older and vulnerable people. Offering attractive alternative housing choices for older people and vulnerable groups will assist in freeing-up family sized homes that are currently under-occupied.

- 13.8.2 There is, therefore, a need to provide suitable accommodation for various groups of people, including the elderly, people with disabilities and vulnerable people. This covers a range of housing types, from accessible and adaptable general needs housing to the full range of retirement and specialised housing for those with support or care needs.
- 13.8.3 The Government's reform of Health and Adult Social Care is underpinned by a principle of sustaining people at home as long as possible. Therefore, accommodation for the elderly is moving towards more flexible forms of living and support, which seek to maintain people's independence. There are several options where residents can enjoy their own self-contained home within a site offering extra facilities.
- 13.8.4 The Council will require that all development schemes provide accessible and adaptable homes to meet the changing needs of occupants over their lifetime, and will encourage the provision of specialist types of retirement housing (within the C3 Use Class), such as sheltered housing and flexi-care housing, as part of the development of larger sites. Consideration should also be given to the provision of bungalows which have been identified as a preferred housing type by many older people in the District.
- 13.8.5 People who are unable to live independently require specialist residential or nursing care accommodation. This type of accommodation usually falls within the C2 Use Class. It is important to note that the objectively assessed housing need (OAN) for the District does not include the projected increase of the institutional population. The SHMA (2015) identifies the projected growth in population aged 75 or over living in communal establishments in the District, as 529 persons, between 2011-2033.

- 13.8.6 Therefore, in addition to the overall housing target, this Plan supports a gross increase of at least 530 bed-spaces of C2 provision, primarily to help meet the accommodation needs of older people who need to live in an environment which provides residential or nursing care. However, other people including young people, people with physical disabilities or sensory needs, people with learning difficulties and other vulnerable people may also require specialist accommodation.
- 13.8.7 Specialist types of retirement housing and specialist residential and nursing care accommodation should normally be located within settlements where there is easy access to a range of services e.g. shops, healthcare facilities, social facilities, and sustainable transport options.
- 13.8.8 As people's housing needs change over their lifetimes, it is important to promote the construction of flexible, adaptable and accessible homes that can respond to the changing needs of individuals and families at different stages of life at minimal cost. Therefore, it makes practical, social and economic sense to incorporate accessible and adaptable design features from the outset, at the start of a building's life, to help people remain independent in their own homes and enjoy a good quality of life.
- 13.8.9 In 2015, the Government introduced new 'optional' Building Regulations standards relating to accessible and adaptable dwellings and wheelchair user or wheelchair adaptable dwellings (Requirement M4(2) (accessible and adaptable dwellings) and M4(3) (wheelchair user dwellings)). These optional requirements can only be secured through planning policy, and Planning Practice Guidance states that local authorities should identify the proportion of dwellings in new developments that should comply with the requirement in their Local Plan.
- 13.8.10 The SHMA (2015) identifies that evidence supports the need for all new dwellings to meet Category 2 requirements (accessible and adaptable dwellings), and the need for 10% of market housing and 15% of affordable housing to meet Category 3 requirements (wheelchair user dwellings),

provided that the overall viability of a development scheme is not compromised.

- 13.8.11 Part M of the Building Regulations sets a distinction between wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) and wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) dwellings. Planning Practice Guidance states that a policy requiring wheelchair accessible dwellings should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. Therefore, the Council will negotiate a proportion of wheelchair adaptable (market and affordable housing) and/or wheelchair accessible (affordable housing only) dwellings on sites proposing 11 or more additional dwellings, as appropriate.

Policy HOU6 Specialist Housing for Older and Vulnerable People

- I. The Council will encourage the provision of specialist housing, across all tenures, for older and vulnerable people. Proposals for new housing for older and vulnerable people will be expected to:
 - (a) Provide a range of accommodation size, tenure and type with the opportunity to attain additional or specialist care as needed within the one development.;
 - (b) Be in a suitable location where access to a choice of sustainable travel options is available;
 - (c) Be within walking distance, on a safe and level route or within easy reach by passenger transport, to town centre shops and services;
 - (d) Be well integrated with existing communities through the sharing of space and public access to services where appropriate;
 - (e) Consider the integration of healthcare facilities within the development.
- II. In addition to the overall housing target, a gross increase of at least 530 bed-spaces to help meet the accommodation needs of

those who need specialist (Use Class C2) residential or nursing care will be supported in the District's towns.

Policy HOU7 Accessible and Adaptable Homes

- I. In order to ensure delivery of new homes that are readily accessible and adaptable to meet the changing needs of occupants, and to support independent living, the Council will require that:
 - (a) all new residential development should meet the Building Regulations Requirement M4(2): Category 2 – Accessible and Adaptable Dwellings; and
 - (b) on sites proposing 11 or more gross additional dwellings, a proportion of dwellings will be expected to meet the Building Regulations Requirement M4(3): Category 3 – Wheelchair User Dwellings, where appropriate. .
- II. Only where circumstances exist where it can be demonstrated by the applicant that it is not practically achievable or financially viable to deliver this policy, will new development be exempt from the requirement.

13.9 Self-Build and Custom Build Housing

13.9.1 Self-Build or Custom Build housing is housing built or commissioned by individuals (or groups of individuals) to be occupied by themselves as their sole or main residence. For the purposes of planning policy, self-build and custom build dwellings share the same definition and the terms are used interchangeably. Self-build is where a person is directly involved in organising and constructing their home, whereas custom build is where a person commissions a specialist developer to help to deliver their own home. Both routes require significant input from the home owner in the design process of the dwelling.

13.9.2 The Self-Build and Custom Housebuilding Act 2015 places a duty on local authorities to keep and have regard to a

register of people who are interested in self-build or custom build projects in their area. In addition, local authorities are required to grant sufficient suitable development permissions on serviced plots of land to meet the demand, as evidenced by the number of people on the register, for self-build and custom build plots in their area.

- 13.9.3 The Council considers that self-build and custom build housing can play an important part in contributing to the supply of housing, increasing the mix of housing types and tenures, and have the potential to increase the delivery of innovative and highly sustainable developments in a cost effective manner.
- 13.9.4 Therefore, to support prospective self-builders, developers of sites proposing 200 or more dwellings, will be expected to supply a proportion of serviced dwelling plots for sale to self-builders.
- 13.9.5 The Localism Act 2011 provides communities with the opportunity to encourage self-build and custom build housing by creating planning policies or allocating new development sites in their area. The Council will support locally proposed self-build projects identified within a Neighbourhood Plan wherever possible.

Policy HOU8 Self-Build Housing

- I. To support prospective self-builders, on sites of more than 200 dwellings, developers will be expected to supply 5% of dwelling plots for sale to self-builders, having regard to the need identified on the Council's Self-Build and Custom Build Register.
- II. The Council will support locally proposed self-build projects identified within a Neighbourhood Plan wherever possible.
- III. Planning permissions should include conditions requiring self-build developments to be completed within 3 years of a self-builder purchasing a plot.
- IV. Where plots have been made available and marketed

appropriately for at least 12 months and have not sold out, the plot(s) may either remain on the open market as self-build or be built out by the developer.

13.10 Gypsies and Travellers and Travelling Showpeople

- 13.10.1 In addition to meeting the needs of the settled population, national policy requires that local planning authorities make provision for Gypsies and Travellers and Travelling Showpeople within their local plans, by setting respective pitch and plot targets to meet likely permanent and transit site accommodation needs in their area.

The national approach to planning for the needs of Gypsies and Travellers and Travelling Showpeople is set out in 'Planning policy for traveller sites' DCLG, August 2015. This can be viewed and downloaded from the Government's publications website at: www.gov.uk/government/publications/planning-policy-for-traveller-sites

A definition of Gypsies and Travellers and Travelling Showpeople for planning policy purposes is contained in Annex 1 of this document.

- 13.10.2 Criteria based policies are also required to both guide land supply allocations and provide a basis for determining planning applications.
- 13.10.3 There are currently three authorised private Gypsy and Traveller sites in East Herts:
- Nine Acres, High Cross: 8 permitted pitches;
 - Field Farm, Levens Green: 6 permitted pitches; and
 - The Stables, Bayfordbury: 8 permitted pitches.
- 13.10.4 There is currently one authorised private Travelling Showpeople's site (yard) in East Herts:
- Rye House.
- 13.10.5 The Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016, identified that 5 permanent pitches for Gypsies and

Travellers and 9 plots for Travelling Showpeople should be provided in the district for the period up to 2033.

- 13.10.6 For Gypsies and Travellers, 2 pitches will be required up to 2022, with a further 3 pitches between 2022-2027. These pitch requirements arise from two sites at:
- The Stables, Bayford (3 pitches), which will be met via expansion of that site; and
 - Unauthorised pitches at Esbies, Sawbridgeworth (2 pitches), which will be met within a new site for 15 pitches to be established within Birchall Garden Suburb, which will also contribute to meeting the needs of Welwyn Hatfield Borough.
- 13.10.7 As the identification of accommodation needs for Gypsies and Travellers is less certain beyond year 10 of the Plan, and an up-to-date understanding of the needs of Gypsy and Traveller communities will need to be maintained throughout the plan period, it is considered appropriate that provision should not be specifically allocated post-2027 without a demonstration of precise need at this time. However, in anticipation of future accommodation needs occurring, 2 further pitches should be reserved within the new site at Birchall Garden Suburb, and an additional new Gypsy and Traveller site should also be identified within the Gilston Area site allocation for future need towards the end of the plan period and/or beyond. Land should be safeguarded as part of the overall development of these sites for such purposes.
- 13.10.8 For Travelling Showpeople, 7 plots will be required up to 2022; one plot is required between 2022 and 2027; and a further plot between 2027 and 2033 (totalling 9 plots across the plan period). All of these plot requirements arise from the Rye House site, which is fully occupied with no room for expansion. A new yard should be identified within Gresley Park to provide 5 plots towards meeting the needs of the first five years; and 4 plots should also be allocated within the development to the North and East of Ware to meet the residual need across the plan period. In order to ensure that any, as yet unidentified, Travelling Showpeople's needs can be accommodated the allocated site to the North and East of Ware should also include sufficient safeguarded land for future expansion within a site area large enough to

accommodate a total of 8 plots overall, as need dictates. Additionally, the Gilston Area should also include sufficient safeguarded land for future longer term provision within a site area large enough to accommodate a total of 8 plots overall.

Policy HOU9 Gypsies and Travellers and Travelling Showpeople

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

Gypsy and Travellers:	
The Stables, Bayford	3 additional pitches (2 to be provided in the period up to 2022; and 1 between 2022 and 2027) within the allocated site area.
Birchall Garden Suburb, East of Welwyn Garden City	4 pitches (2 to be provided between 2022 and 2027; and 2 to allow for longer-term accommodation needs) for East Herts within an area sufficient to accommodate a total of 15 pitches (11 for Welwyn Hatfield) to meet the accommodation needs of both East Herts and Welwyn Hatfield and/or for future expansion, as evidence of need dictates.
The Gilston Area	To allow for longer-term accommodation needs, an area of suitable land should be safeguarded that would allow for future provision of a total of 15 pitches, to be delivered towards the end of the Plan period and/or beyond, as evidence of need dictates.
Travelling Showpeople:	
Gresley Park, East of Stevenage	5 plots (each of sufficient size to allow for the provision of

	accommodation and equipment plus storage/maintenance).
North and East of Ware	4 plots (each of sufficient size to allow for the provision of accommodation and equipment plus storage/maintenance) within the first phase of development to be provided within a larger area that should be safeguarded to allow for future expansion to a total of 8 plots, as evidence of need dictates.
The Gilston Area	To allow for longer-term accommodation needs, an area of suitable land should be safeguarded that would allow for future provision of a total of 8 plots (each of sufficient size to allow for the provision of accommodation and equipment plus storage/maintenance), to be delivered towards the end of the Plan period and/or beyond, as evidence of need dictates.

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

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

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

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

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

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

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

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

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

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

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

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

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

VI. Existing authorised sites for Gypsies and Travellers and Travelling Showpeople will be safeguarded from development which would preclude their continued occupation by these groups, unless

acceptable replacement accommodation can be provided or the site is no longer required to meet an identified need.

13.11 New Park Home Sites for Non-Nomadic Gypsies and Travellers and Travelling Showpeople

13.11.1 The NPPF makes it clear that local planning authorities should consider the Government's 'Planning policy for traveller sites' (PPTS), in conjunction with the NPPF, when preparing plans or making decisions on travellers sites in their area. PPTS identifies a definition distinction that Gypsies and Travellers who no longer lead a nomadic lifestyle are treated as non-travelling Gypsies and Travellers for the purposes of the planning system and their needs must therefore be met by the requirements of the NPPF. However, the Human Rights Act 1998 and the Equalities Act 2010 protect their cultural choice to live in mobile accommodation and therefore there is a need to plan for park homes within the Plan.

13.11.2 The Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016, identified ten Gypsy and Traveller households and 16 Travelling Showpeople households who do not meet the PPTS definition. While the accommodation needs of these households has yet to be fully determined, provision will be met through the application of HOU1 and through the consideration of any other applications submitted, in accordance with the following policy.

Policy HOU10 New Park Home Sites for Non-Nomadic Gypsies and Travellers and Travelling Showpeople

- I. Any applications for planning permission for Gypsy and Traveller and Travelling Showpeople park homes must be in accordance with the NPPF and PPTS and the following criteria should be satisfied:
 - (a) the site is in a sustainable location in terms of accessibility to existing local services;

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

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

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

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

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

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

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

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

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

13.12 Replacement Buildings in the Green Belt and the Rural Area Beyond the Green Belt

13.12.1 The replacement of buildings on a one-to one basis can be a means of securing more functional buildings to meet present and future needs. The Council is committed to maintaining

the character and appearance of the District. Proposals for a replacement building should be in the same use and not be materially larger than the one it replaces.

13.12.2 The Council may control the further extension of replacement buildings by the removal of permitted development rights.

13.12.3 The replacement of a building in the Green Belt or the Rural Area Beyond the Green Belt will be permitted provided the new building is in the same use and is not materially larger than the one it replaces in accordance with Policy GBR1 (Green Belt) and Policy GBR2 (Rural Area Beyond the Green Belt).

13.13 Extensions and Alterations to Dwellings and Residential Outbuildings

13.13.1 A large number of the planning applications received by the Council relate to extensions to dwellings. In an area as large and diverse as East Hertfordshire, it is not possible to provide precise standards relevant to every case, but the policies below set out the principles and criteria by which proposals will be judged.

13.13.2 The Council will expect all proposals for extensions and alterations to dwellings and residential outbuildings to be of a high standard of design that is appropriate to the character and appearance of the dwelling and the surrounding area. All householder development proposals should be sensitively designed to ensure that they would not have an unacceptable impact upon the amenities of the occupiers of the existing dwelling and any neighbouring dwellings. In particular the Council will assess proposals having regard to any loss of light, privacy and outlook and overbearing impacts that the development could have upon existing and future occupiers of the host dwelling and adjoining dwellings. In addition to the policies below, applications for extensions will also be considered against Policy DES3 (Design of Development) where appropriate.

13.13.3 Within the Green Belt and Rural Area Beyond the Green Belt, the Council is concerned about the specific effect

extensions and outbuildings may have on the character and appearance of an existing dwelling, the site and surrounding area. Whilst extensions to dwellings or the erection of outbuildings are not in principle inappropriate development, they should not result in disproportionate additions over and above the size of the original dwelling; the Council is also concerned with the cumulative impact of development in the countryside.

Policy HOU11 Extensions and Alterations to Dwellings, Residential Outbuildings and Works Within Residential Curtilages

Proposals for:

- extensions and alterations to dwellings;
- residential outbuildings or extensions to existing outbuildings; and
- works within residential curtilages,

will be considered in accordance with Policies GBR1 (Green Belt) and GBR2 (Rural Area Beyond the Green Belt), and against the following criteria:

(a) be of a size, scale, mass, form, siting, design and materials of construction that are appropriate to the character, appearance and setting of the existing dwelling and/or the surrounding area, and extensions should generally appear as a subservient addition to the dwelling;

(b) side extensions at first floor level or above should ensure appropriate space is left between the flank wall of the extension and the common curtilage with a neighbouring property (as a general rule a space of 1 metre will be the minimum acceptable), to safeguard the character and appearance of the street scene and prevent a visually damaging 'terracing' effect;

(c) flat roofed extensions, except those on the ground floor, will be refused as visually undesirable other than in those exceptional circumstances where the character of the original dwelling allows a flat-roofed design to be appropriately incorporated, or it represents a sustainable or innovative design approach;

(d) roof dormers may be acceptable if appropriate to the design and character of the dwelling and its surroundings. Dormers

should generally be of limited extent and modest proportions, so as not to dominate the existing roof form.

13.14 Change of Use of Land to Residential Garden and Enclosure of Amenity Land

13.14.1 The Council seeks to ensure that changes of use of land to residential garden do not result in harmful incursions into the countryside that would have an adverse effect on the character and appearance of rural landscapes. The residential use of rural land can have adverse effects on the character of the countryside from, for example, the erection of fences, garden sheds and other domestic paraphernalia. Where necessary, conditions may be attached to planning permissions for residential garden extensions which remove the occupier's permitted development rights.

13.14.2 In urban areas, the extension of private gardens involving the enclosure of amenity land/open space/landscaped areas around housing development might have a detrimental effect on the appearance of an area. Consideration will need to be given to whether proposals to enclose such land would be harmful to the character, appearance, design and layout of the development.

Policy HOU12 Change of Use of Land to Residential Garden and Enclosure of Amenity Land

I. The change of use of land to residential garden may be permitted if the proposal:

(a) is not likely to result in an adverse effect on the character and appearance of the surrounding area and landscape;

(b) is well related to other residential land and does not involve a harmful incursion into the countryside;

(c) includes the provision of appropriate landscaping and boundary treatment.

II. The Council will seek to ensure the retention of amenity land/open

space/landscaped areas around housing developments and planning permission for the enclosure of such land into gardens will not usually be given.

13.15 Residential Annexes

- 13.15.1 A significant number of planning applications are received seeking permission to extend properties or for outbuildings to be used as a self-contained annexe to accommodate elderly relatives, older children or staff. Annexes for elderly relatives particularly, can help to meet social needs whilst reducing pressure on other types of accommodation. However, they can have implications for car parking provision, amenity space, and impact on neighbouring properties, occupiers and the locality.
- 13.15.2 The Council considers that annexes should be designed as an integral part of the existing dwelling or as a separate outbuilding, which is close to and related to the main dwelling. Applications will need to justify the level of accommodation proposed and demonstrate how it is compatible with the requirements of the annexe.
- 13.15.3 Where necessary, a condition may be attached to the planning permission to require that the annexe is occupied for purposes ancillary to the residential use of the host dwelling. Within the Green Belt and Rural Area Beyond the Green Belt, permission would be unlikely to be granted for later sub-division to two separate residential units, unless the proposal meets the planning criteria which would be applied to new proposals for a separate dwelling. In an urban setting there would be no in-principle objection to a new dwelling, subject to design and amenity issues.

Policy HOU13 Residential Annexes

- I. Residential annexes will be permitted where:
- (a) the accommodation forms an extension to the main dwelling and is capable of being used as an integral part of the dwelling or forms a separate outbuilding which is close to and well related to

and have a clear functional link to the main dwelling;

(b) the scale of the annexe does not dominate the existing dwelling and is the minimum level of accommodation required to support the needs of the occupant;

(c) sufficient space to park vehicles for both parts of the dwelling, in accordance with adopted standards, is available and appropriately located in design terms within the curtilage;

(d) the development accords with Policy HOU11 (Extensions and Alterations to Dwellings, Residential Outbuildings and Works within Residential Curtilages).

EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 25 AUGUST 2016

REPORT BY LEADER OF THE COUNCIL

EAST HERTS DRAFT DISTRICT PLAN – CHAPTER 25 – DELIVERY: RESPONSE TO ISSUES RAISED DURING PREFERRED OPTIONS CONSULTATION, FURTHER AMENDMENTS AND DRAFT REVISED CHAPTER (RENAMED DELIVERY AND MONITORING)

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

The purpose of this report is:

- To bring to Members' attention the issues raised through the Preferred Options consultation in connection with Chapter 25 (Delivery) of the Draft District Plan Preferred Options version, together with Officer responses to those issues;
- To explain to Members why further amendments to Chapter 25 (Delivery) are required to ensure that the final draft District Plan reflects the most up-to-date policy position and the latest available evidence;
- To place before Members for consideration a draft revised chapter, for subsequent incorporation into the final draft District Plan.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:	
(A)	the issues raised in respect of Chapter 25 (Delivery) of the Draft District Plan Preferred Options, as detailed at Essential Reference Paper 'B' to this report, be received and considered;
(B)	the Officer response to the issues referred to in (A) above, as detailed in Essential Reference Paper 'B' to this report, be agreed;

(C)	the further amendments in respect of Chapter 25 (Delivery) of the Draft District Plan Preferred Options, as detailed at Essential Reference Paper ‘B’ to this report, be received and considered; and
(D)	the draft revised Chapter 25 (Delivery and Monitoring), as detailed in Essential Reference Paper ‘C’ to this report, be agreed as a basis for inclusion in the final draft District Plan, with the content being finalised when the consolidated plan is presented in September 2016.

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.

1.2 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.

1.3 This report presents a draft revised chapter on Delivery for subsequent incorporation into the final Draft District Plan. **Essential Reference Paper ‘B’** contains the Issues Report and **Essential Reference Paper ‘C’** the draft revised chapter.

2.0 Report

2.1 The Issue Report is split into two parts. The first part summarises the issues raised through the Preferred Options Consultation. The issues are grouped according to the section of the Draft Plan they relate to. The table presents an officer response to each issue and then sets out any subsequent 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 being proposed.

2.2 The second part of the Issue Report details any further amendments that are required to ensure that the final draft District

Plan reflects the most up-to-date policy position and the latest available evidence.

- 2.3 The Delivery chapter outlines the importance of monitoring the effectiveness of policies on an annual basis through the Authority Monitoring Report. A Monitoring Framework was included within Appendix D of the Preferred Options version of the District Plan. This Framework will be updated and a revised version will be presented to District Planning Executive Panel in September, alongside a completed Infrastructure Delivery Plan.
- 2.4 The Preferred Options version of the District Plan was consulted upon in 2014. At that time it was envisaged that the Council would seek to introduce a Community Infrastructure Levy (CIL) for East Herts. To date, the Council has not made a decision in this regard. The Delivery chapter has therefore been updated to reflect this position while indicating that the Council will consider the merits of introducing CIL at a later date.
- 2.5 Members are therefore invited to agree the draft revised Chapter 25 (Delivery and Monitoring), as detailed in **Essential Reference Paper 'C'** to this report, as a basis for inclusion in the final draft District Plan, with the content being finalised when the consolidated plan is presented in September 2016.
- 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:	Priority 1 – Improve the health and wellbeing of our communities Priority 2 – Enhance the quality of people's lives Priority 3 – Enable a flourishing local economy
Consultation:	The Report refers to the Draft District Plan consultation carried out between 27 th February and 22 nd May 2014.
Legal:	None
Financial:	None
Human Resource:	None
Risk Management:	None
Health and wellbeing – issues and impacts:	The Pre-Submission 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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Part 1: Issues Raised Through the Preferred Options Consultation

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
Introduction				
25.01	25.1.1	This paragraph is too vague. It should be clearer with regards to identifying the organisations that are responsible for infrastructure delivery.	It is not considered necessary to list all service and infrastructure providers in this chapter. The Infrastructure Delivery Plan identifies all infrastructure schemes that are required in order to facilitate growth, along with the organisation that is responsible for delivery.	No amendment in response to this issue
25.02	25.1.1	This section provides no certainty of delivery. Evidence is required that the sites will be delivered on time.	Prior to submission of the District Plan to the Secretary of State, the Council will seek to agree Statements of Common Ground with the site promoters/developers for each of the sites identified in the Plan. These documents will state when development is expected to start and, where relevant, how housing completions and infrastructure delivery will be phased.	No amendment in response to this issue
Infrastructure and Service Delivery				
25.04	DEL1	The Police and Crime Commissioner identifies that approximately £750,000 would be required from planning obligations by 2031 in order to contribute towards policing costs. Beyond 2031, around £3,000,000 maybe necessary in order to provide new facilities required to meet demands arising from development of the Gilston Area.	Planning obligations for policing and community safety are already sought for new developments on a case by case basis. The level of contributions required to meet demands arising from future growth are noted. The Planning Obligations SPD will be updated following adoption of the District Plan.	No amendment in response to this issue
25.05	DEL1	Stevenage Borough Council states that the Plan relies on the delivery of three Broad Locations which are currently uncertain due to the level of infrastructure requirements. Limited development to	Given the amount of evidence that is now available, it is the view of Officers that the three sites previously identified as Broad Locations should now be proposed for allocation within	No amendment in response to this issue

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
		the east of Stevenage may assist in providing greater certainty of delivery.	the Pre-Submission version of the District Plan. However, given the need to be able to demonstrate a sufficient supply of sites in the first 5 years of the Plan period, it is also the view of Officers that a site to the east of Stevenage should be allocated for 600 homes.	
25.06	DEL1	The timetable for producing the Infrastructure Delivery Plan should be provided.	The Infrastructure Delivery Plan will be presented to the District Planning Executive Panel in September 2016 and will be submitted to the Planning Inspectorate alongside the District Plan in March 2017.	No amendment in response to this issue
25.07	DEL1	The Highways Agency recommends that further modelling is undertaken in order to understand what mitigation is required on the strategic highway network. Unless schemes are currently committed, it should not be assumed that the Agency would be able to fund them. Developers should therefore contribute towards the cost of such schemes.	<p>Following the Preferred Options consultation the Council has been closely engaged in further transport modelling which is being undertaken by Essex and Hertfordshire County Councils respectively. The modelling demonstrates that the road network can cater for the planned level of growth providing that key mitigation schemes are delivered. These include improvements to Junctions 7 and 8 of the M11 and the provision of a new Junction 7a within the plan period.</p> <p>Highways England (previously known as The Highways Agency) has been engaged in the ongoing work through attendance at the Co-op Member Board. The four authorities that comprise the housing market area are working closely with Highways England in order to agree how strategic interventions can be delivered. A Memorandum of Understanding (MoU) is being prepared, which will be signed</p>	No amendment in response to this issue

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
			by Highways England, Essex and Hertfordshire County Councils and the four local authorities that comprise the housing market area (including East Herts). The MoU will confirm that the respective authorities will work collaboratively to identify, develop and deliver highway infrastructure schemes in order to support housing growth. In particular, the early delivery of a new Junction 7a on the M11 is key to unlocking development potential across the wider sub-region.	
25.08	DEL1	Essex County Council indicates that effective collaboration between the two authorities will be very important.	Noted. The four authorities that comprise the housing market area are engaged with both Hertfordshire and Essex County Councils through the Co-op Board. Infrastructure requirements that arise from these ongoing discussions will be identified within the Infrastructure Delivery Plan.	No amendment in response to this issue
25.09	DEL1	The Lee Valley Regional Park Authority supports identification of green infrastructure schemes as part of the Infrastructure Delivery Plan. The Authority's PDF Area Proposals may be able to feed into this process.	It is noted that the Park Development Framework is currently in preparation and that emerging work on areas within East Herts District was consulted on in early 2016. The Infrastructure Delivery Plan is a 'live' document which will be updated regularly. The Council will therefore continue to work with the Regional Park Authority in order to identify green infrastructure schemes that could be delivered through the use of Section 106 contributions.	No amendment in response to this issue

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
25.10	DEL1	Thames Water supports this policy. Developers need to demonstrate that adequate wastewater capacity can be provided in tandem with development. Where necessary it may be necessary to ensure that development does not occur ahead of infrastructure delivery through the use of Grampian conditions.	Support noted and welcomed. The use of Grampian style conditions could be considered at the planning application stage if necessary. A Grampian condition is a planning condition attached to a decision notice that prevents the start of a development until off-site works have been completed on land not controlled by the applicant.	No amendment in response to this issue
25.11		Hertfordshire County Council indicates that serious consideration should be given to the introduction of a Community Infrastructure Levy in order to ensure that sufficient financial contributions can be secured.	The Council has not come to a view on whether to introduce the Community Infrastructure Levy (CIL). The considerations are complex and, given the experience of those Hertfordshire authorities who have introduced CIL, it is not necessarily the case that it would provide a greater amount of contributions than the existing S106 regime. However, the Council will continue to keep this situation under review over the coming months.	No amendment in response to this issue
Developer Contributions				
25.12	DEL2	There needs to be a mechanism by which local communities can claim some of the money which gets raised through planning obligations.	Under the current S106 arrangements there is no mechanism by which Parish and Town Councils can receive some of the funding received from developers. Should the Council choose to introduce a Community Infrastructure Levy in due course, Parish and Town Councils would receive a certain percentage of contributions received for developments in their areas. The amount of money passed on to local communities increases where a Neighbourhood Plan is in	No amendment in response to this issue

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
			place. This will be one of the issues which the Council takes into account over the coming months when considering whether to introduce CIL.	
25.13	DEL2	The Environment Agency supports inclusion of nature conservation, landscaping improvements and flood mitigation on the list of infrastructure schemes listed in the policy.	Support noted and welcomed.	No amendment in response to this issue
25.14	DEL2	Care needs to be taken when introducing CIL that 'double counted' doesn't occur by seeking contributions for a project, both through CIL and S106.	Noted. It is recognised that this has been an issue elsewhere in the country and therefore would need to be carefully considered should the Council choose to introduce CIL.	No amendment in response to this issue
25.15	DEL2	The Council are reminded that S106 contributions can only be sought where they are necessary to address the unacceptable impacts of a proposal. Planning Obligations cannot be sought for desirable pieces of infrastructure.	Noted, the Council is aware of the relevant regulations.	No amendment in response to this issue

Part 2: Other Proposed Amendments

Location/ Paragraph/Policy	Issue	Proposed Amendment
Chapter title	Amend chapter title to reflect that the text covers monitoring as well as delivery.	25. Delivery <u>and Monitoring</u>
25.2.1	As this is the final version of the District Plan, the paragraph needs to be updated to state that an Infrastructure Delivery Plan has been prepared.	In order to guide the timely provision of infrastructure and services, and to provide evidence for the need for corrective action where necessary, an Infrastructure Delivery Plan (IDP) <u>has been</u> will be prepared. The IDP will identify <u>ies</u> both those facilities that are needed district wide and those that are needed to support particular strategic development.

25.2.2	The Annual Monitoring Report is now known as the Authority Monitoring Report.	The IDP will be updated as part of the Authority annual Monitoring Report (AMR) in cooperation with delivery partners.
DEL1	Update the policy to reflect that IDP has been prepared.	Prepare an Infrastructure Delivery Plan (IDP) to identify the timing, type and number of infrastructure projects required to support the objectives and policies of the strategy as well as the main funding mechanisms and lead agencies responsible for their delivery;
25.3	This section needs to be re-worded to reflect the fact that no decision has been taken with regards to introducing a Community Infrastructure Levy.	<p>There are two main mechanisms by which the District Council will seek developer contributions towards the provision of infrastructure and services to support development.</p> <p>The Community Infrastructure Levy (CIL) is a non-negotiable charge which will be used to fund a range of items which are not necessarily directly related to the development. A separate CIL Charging Schedule will be prepared using appropriate evidence. CIL is particularly helpful in addressing the cumulative impact of small and medium sized developments across an area. The Charging Schedule will contain the details of the proposed CIL.</p> <p>Planning Obligations <u>will</u> may also be sought under Section 106 of the Town and Country Planning Act <u>in order to secure financial contributions towards the provision of infrastructure and services to support development</u>. Planning Obligations will only be sought where they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development. Planning obligations are particularly helpful on large development schemes where there are complex infrastructure needs.</p> <p>The District Council will monitor and challenge where appropriate, the financial viability of the cumulative planning costs on development. A level of contributions will be sought which does not jeopardise the implementation of the District Plan.</p> <p><u>In addition, the District Council will also give consideration to introducing a Community Infrastructure Levy (CIL) in order to support the provision of future infrastructure schemes.</u></p>
DEL2	As no decision has been taken with regards to the Community Infrastructure Levy, Policy DEL2 needs to be updated.	<p>DEL2 Community Infrastructure Levy (CIL) and Planning Obligations</p> <p>I. In accordance with the Community Infrastructure Levy (CIL) Charging Schedule, the Council will seek contributions for the provision of strategic infrastructure to support growth across East Herts, and beyond.</p>
25.4.2	Need to clarify that the Monitoring Framework will be	A Monitoring Framework has been prepared as part of the District Plan. Monitoring will be proportionate to the needs of an effective plan, and will be targeted at those areas where it

	<p>reported annually through the AMR.</p>	<p>can add value to the development process. The proposed Framework is located at Appendix D. <u>Progress made against each of the indicators contained in the Monitoring Framework will be reported on an annual basis as part of the Authority Monitoring Report.</u></p>
<p>25.4.3</p>	<p>Delete paragraph in order to avoid repetition regarding monitoring and preparation of an Infrastructure Delivery Plan.</p>	<p>The delivery of development and supporting infrastructure is one of the most important aspects of the plan. A housing trajectory showing the best available information in relation to the phasing of development at specific sites will be maintained, broken down by year for the first five years. An Infrastructure Delivery Plan (IDP) will be prepared and updated annually in parallel with the AMR, and will indicate whether and how the necessary infrastructure is on course for timely delivery alongside housing and other development. If monitoring reveals doubts about the timely delivery of supporting infrastructure, appropriate interventions will be necessary.</p>

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ESSENTIAL REFERENCE PAPER 'C'

25 Delivery and Monitoring

25.1 Introduction

25.1.1 Implementation of the objectives and policies in the District Plan relies on the provision of a wide range of infrastructure and services, the majority of which are not provided by the District Council. Successful implementation of the District Plan will therefore require the Council as local planning authority to take on the role of co-ordinator or facilitator, rather than a direct provider of infrastructure and services in most cases.

25.2 Infrastructure and Service Delivery

25.2.1 In order to guide the timely provision of infrastructure and services, and to provide evidence for the need for corrective action where necessary, an Infrastructure Delivery Plan (IDP) has been prepared. The IDP identifies both those facilities that are needed district wide and those that are needed to support particular strategic development.

25.2.2 The IDP will be updated as part of the Authority Monitoring Report (AMR) in cooperation with delivery partners.

25.2.3 New development has the potential, individually and/or cumulatively to cause significant strain on existing infrastructure or services. All new development proposals will need to take account of these wider impacts on existing communities. In some cases proposals will impact upon strategic infrastructure, for example Rye Meads Sewerage Treatment works, secondary schools, or the strategic highways network. Development can also lead to off-site impacts within the locality, for example on the local road network or open space provision in existing residential or other areas. Where proposals cannot demonstrate the deliverability of supporting infrastructure, they will be refused.

Policy DEL1 Infrastructure and Service Delivery

I. The District Council will work in partnership with providers of infrastructure and services to facilitate the timely provision of infrastructure necessary to support sustainable development. In support of this work the Council will:

(a) Maintain an up-to date Infrastructure Delivery Plan (IDP) to identify the timing, type and number of infrastructure projects required to support the objectives and policies of the strategy as well as the main funding mechanisms and lead agencies responsible for their delivery;

(b) Use the District Plan and IDP to bid for funding necessary to support development, working in partnership with the Local Economic Partnership (LEP), Hertfordshire Infrastructure Planning Partnership (HIPP), the Local Transport Body (LTB), the Local Nature Partnership (LNP), and other bodies as appropriate;

(c) Monitor capacity in infrastructure and services through annual updates of the IDP and future infrastructure needs assessments;

(d) Review the District Plan if evidence in the IDP indicates a changed outlook for the realistic prospects for delivery of infrastructure to support development.

II. For individual development proposals, developers will be required to:

(a) Demonstrate, at the planning application stage, that adequate infrastructure capacity can be provided both on and off site to enable the delivery of sustainable development within the site, the locality and the wider area, as appropriate. Where proposals cannot demonstrate the deliverability of supporting infrastructure, they will be refused;

(b) Ensure that development is phased to coincide with the delivery of additional infrastructure or service capacity as set out in the IDP;

(c) Ensure that infrastructure assets and services are delivered to adoptable standards. Suitable long-term management arrangements

must be put in place with a view to secure adoption by the appropriate authority in the longer term.

25.3 Developer Contributions

25.3.1 Planning Obligations will be sought under Section 106 of the Town and Country Planning Act in order to secure financial contributions towards the provision of infrastructure and services to support development. Planning obligations will only be sought where they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development. Planning obligations are particularly helpful on large development schemes where there are complex infrastructure needs.

25.3.2 The District Council will monitor and challenge where appropriate, the financial viability of the cumulative planning costs on development. A level of contributions will be sought which does not jeopardise the implementation of the District Plan.

25.3.3 In addition, the District Council will also give consideration to introducing a Community Infrastructure Levy (CIL) in order to support the provision of future infrastructure schemes.

Policy DEL2 Planning Obligations

I. The Council will seek a range of planning obligations. Planning obligations will only be sought where they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development.

II. The provision of infrastructure referred to in I. above, includes, but is not limited to: affordable housing, open space and recreation facilities, community, education and health facilities, sustainable transport modes, highway improvements, nature conservation, landscape and

landscaping improvements, low carbon and decentralised energy, flood mitigation and sustainable construction.

25.4 Monitoring

25.4.1 Regular monitoring of actual development outcomes against the plan is an essential part of ensuring that the plan is effective. Monitoring can indicate areas where interventions may be needed to achieve the objectives of the plan, and may also demonstrate the need for a review of the plan.

25.4.2 A Monitoring Framework has been prepared as part of the District Plan. Monitoring will be proportionate to the needs of an effective plan, and will be targeted at those areas where it can add value to the development process. The proposed Framework is located at Appendix D. Progress made against each of the indicators contained in the Monitoring Framework will be reported on an annual basis as part of the Authority Monitoring Report.

EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 25 AUGUST 2016

REPORT BY THE LEADER OF THE COUNCIL

STRATEGIC LAND AVAILABILITY ASSESSMENT, AUGUST 2016

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report presents the Strategic Land Availability Assessment, August 2016.

<u>RECOMMENDATION FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:

(A)	the Strategic Land Availability Assessment, August 2016, be supported as part of the evidence base to inform and support the East Herts District Plan.
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1.0 Background

1.1 National planning policy requires all Local Planning Authorities to produce a technical study known as the Strategic Land Availability Assessment (SLAA) in order to identify sites with potential for future development. The results of the SLAA are intended to inform ongoing work on the District Plan and Neighbourhood Planning, along with the identification of future land supply.

1.2 This report seeks to present:

- The methodology for undertaking a SLAA as outlined by the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG);
- An explanation of previous work undertaken including the Call for Sites and Rounds 1 to 4 of the SLAA; and
- The final SLAA site assessments.

2.0 Report

Methodology

- 2.1 Paragraphs 019 to 021 of the PPG identify that, when undertaking a SLAA, sites should be considered against three criteria, namely; suitability, availability and achievability. These terms are explained below.

Suitability

The assessment of suitability takes into account a range of policy constraints. These include environmental and heritage designations, impact on landscape and character, flooding and Green Belt / Rural Area Beyond the Green Belt.

Availability

A site is considered to be available if there are no legal or ownership issues which would prevent the site coming forward for development.

Achievability

Achievability is effectively a judgement about the economic viability of a site, and the capacity of the developer to complete the development over a certain period of time.

- 2.2 Having assessed each site against the three criteria, a conclusion can be reached. If a site is considered to be suitable, available and achievable, then it is regarded as being '**deliverable**'. This means that development could commence on site within five years.
- 2.3 A site is considered '**developable**' if development could commence at a later point in time (i.e. not within five years). The fact that a site is not immediately deliverable could be due to a range of factors including existing policy constraints and land ownership issues. Where this is the case, the Local Planning Authority should identify the issues that need to be overcome in order to facilitate development.
- 2.4 Finally, a site that is neither deliverable nor developable is not considered to be appropriate for development at any point in time.

- 2.5 It is important to note that the SLAA assesses whether a site **could** come forward for development, not whether it **should**. In formulating the development strategy for the District other factors should be considered, in particular the need to promote sustainable patterns of development.

The Call for Sites and SLAA Rounds 1 to 4

- 2.6 The Planning Policy team commenced a Call for Sites in 2009. Through this process, landowners, developers and site promoters were encouraged to submit sites to the Council that they felt could be suitable for future development. Since 2009 the Call for Sites has remained open, and sites have continued to be submitted on a regular basis. All sites received have been fed into the SLAA process.
- 2.7 In addition to the Call for Sites, a Housing Capacity Study was undertaken in 2007. Sites identified through this process have also been considered in the SLAA.
- 2.8 An initial SLAA report was produced in 2012 on Rounds 1 and 2 of the process. Round 1 presented the methodology for assessing sites, while Round 2 presented the assessments for those sites located within existing settlement boundaries. The report was presented to this Panel on 28th November 2012 and is available to view using the link under 'Background Papers' at the end of this report.
- 2.9 Following the completion of Rounds 1 and 2, the Planning Policy team had to prioritise other key areas of work in order to progress the District Plan to the Preferred Options stage in 2014, and towards a Pre-Submission consultation later this year.
- 2.10 Work on Round 3 of the SLAA took place in the second half of 2015. Primarily, this stage provided an assessment of sites in rural areas. An informal stakeholder consultation was undertaken between 15th December and 1st February 2016, during which Ward Members, site promoters, Parish Councils and Neighbourhood Planning Groups were invited to comment on the draft site assessments. Representations received during this time were summarised and presented to District Planning Executive Panel on 25th February.
- 2.11 A final stage of SLAA preparation, Round 4, has since taken place. This round primarily assessed those sites located on the

edge of the main settlements in the District. In addition, any sites submitted to the Council following the completion of Round 3 were also assessed.

- 2.12 A final stakeholder consultation was undertaken on all SLAA assessments between 9th June and 22nd July 2016. Comments received during this period have been analysed, and amendments to the site assessments have been made where considered appropriate. A schedule of comments and officer responses can be found in **Essential Reference Paper B**, while the final SLAA assessments for all sites can be found in **Essential Reference Paper C**. The maps associated with all of the sites are available on the Council's website: <http://maps.eastherts.gov.uk/slaa/>. However, for clarity, a schedule of site addresses is also included in **Essential Reference Paper D**.
- 2.13 It should be noted that, at the time of commencing the stakeholder consultation in June, Officers were still considering the most appropriate village development strategy in consultation with Parish Councils. Having now identified the final proposed strategy, the SLAA assessments have been updated to reflect this position. A revised version of the District Plan Villages chapter will be presented to this Panel on 8th September.

3.0 Implications/Consultations

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

Background Papers

- National Planning Policy Framework (NPPF) (<https://www.gov.uk/government/publications/national-planning-policy-framework--2>)
- Planning Practice Guidance (PPG) (General) (<http://planningguidance.planningportal.gov.uk/>)
- Strategic Land Availability Assessment (SLAA) Rounds 1 and 2 (<http://democracy.eastherts.gov.uk/ieListDocuments.aspx?CId=151&MId=2147>)
- Strategic Land Availability Assessment (SLAA) Round 3 (<http://democracy.eastherts.gov.uk/ieListDocuments.aspx?CId=151&MId=2839>)

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ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives:	Priority 1 – Improve the health and wellbeing of our communities Priority 2 – Enhance the quality of people's lives Priority 3 – Enable a flourishing local economy
Consultation:	A series of informal stakeholder consultations have been undertaken throughout the preparation of the SLAA.
Legal:	None
Financial:	None
Human Resource:	None
Risk Management:	None
Health and wellbeing – issues and impacts:	The Pre-Submission 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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Essential Reference Paper B- Schedule of Representations and Officer Responses.

Site Ref	Settlement	Respondent	Issue/Comments	Officer Response
01/002	Bishop’s Stortford	Site promoter/landowner	This land falls within the Roger Evans Masterplanning Study Final Report, 2005 for development of ASR4. EHC did require developers to observe the technical studies.	Noted although the site did not form part of the site that received planning permission for 2,200 homes. In isolation, the site falls below the SLAA threshold of 0.25 hectares.
01/003	Bishop’s Stortford	Site promoter/landowner	Support for the draft conclusion.	Support noted and welcomed.
01/007	Bishop’s Stortford	Site promoter/landowner	The comment that the site falls within Flood Zone 3 is inaccurate, it has been confirmed that the site is in flood zone 1.	The Council’s current Strategic Flood Risk Assessment (SFRA) shows that the majority of the site lies within Flood Zone 3. However, the SFRA is currently being updated and SLAA assessments can be reviewed to reflect the findings in due course. However, the site is considered unsuitable due to its location within a ‘green wedge’ of Green Belt land.
01/007	Bishop’s Stortford	Site promoter/landowner	The Green Belt review concluded that the “triangle between the railway and Dolphin Way is contained on three sides by development so development within the parcel could not be considered to be sprawl”. Having regard to this the site should be removed from the Green Belt through the District Plan process.	Not agreed. While development in this location may not be considered ‘sprawl’, the site does form part of a wider ‘green wedge’ that helps to protect the setting and special character of the historic, urban environment of Bishop’s Stortford. It is therefore considered that development in this location would be inappropriate. This also reflects the view of the Inspector at the time of the

Site Ref	Settlement	Respondent	Issue/Comments	Officer Response
				Examination for the adopted Local Plan 2007.
01/007	Bishop's Stortford	Planning agent	The address given is misleading it implies that the land forms part of 9 Dolphin Way. The land is in separate ownership and would be better described as "Land adjacent to 9 Dolphin Way" or "Land north of Dolphin Way".	Noted. The address has been updated.
01/010	Bishop's Stortford	Planning agent	There is a large amount of unused land within this site which is not required by the football club. The existing football pitch/stadium would be retained (albeit re-located within the site), whilst the remainder of the site could be developed for commercial uses.	Noted, the assessment has been updated. Consideration of whether to remove the site from the Green Belt will be presented within the Settlement Appraisal for Bishop's Stortford which will be considered at District Planning Executive Panel on 8 th September.
01/011	Bishop's Stortford	Site promoter/landowner	The draft SLAA spreadsheet should be amended to read: "This site is located within the Green Belt, adjacent to the settlement boundary. There are no other policy constraints and GBR2015 concludes that the site is highly suitable for development". In addition, the statement "Up to 17 dwellings subject to a review of the Green Belt" should be moved to the deliverable with policy change column.	Noted, the site assessment has been updated. However, further consideration of development in this location will take place as part of the Bishop's Stortford Settlement Appraisal.

Site Ref	Settlement	Respondent	Issue/Comments	Officer Response
01/017	Bishop's Stortford	Site promoter/landowner	The site could accommodate between 53-63 dwellings. The housing proposed could fit alongside the existing housing in Larkspur Close, with the playing fields situated to the north as part of the green finger. As such it is not considered that the release of this site would compromise the role of the green fingers.	Not agreed. It is considered that development would be inappropriate in this location given that it forms part of one of Bishop's Stortford's 'green wedges' which form an integral part of the character of the town.
01/017	Bishop's Stortford	Site promoter/landowner	There is extreme concern about the proposal to designate area owned by the college as Local Green Space. This designation is a threat to the ability of the college to improve sporting facilities (erection of sporting buildings).	This issue would be addressed at the planning application stage. However, it is likely that expansion of school buildings would represent 'very special circumstances' for development in the Green Belt.
01/019	Bishop's Stortford	Site promoter/landowner	Support for the draft conclusion.	Support noted and welcomed.
01/119	Bishop's Stortford	Planning agent	It is not clear how the figure of 43 dwellings has been derived. Development Brief 2010 sets the vision for a mixed use scheme but gives no indication of housing numbers.	For the purposes of the SLAA, a generic density of 30 dwellings per hectare has been used for sites in Bishop's Stortford. However, it is recognised that this could increase, particularly in town centre locations.

Site Ref	Settlement	Respondent	Issue/Comments	Officer Response
01/119 01/120 & 01/028	Bishop's Stortford	Planning agent	The housing developments are welcomed, however due to the close proximity of the developments to the Sainsbury's store, these sites do not justify the creation of new convenience floor space. New convenience stores could undermine the vitality of the town centre.	The evidence base suggests that there is a need for some additional retail floorspace in the District. All three sites are expected to bring forward a mix of uses in accordance with the respective policies contained within the District Plan. The mix of uses will be discussed at the planning application stage.
01/030	Bishop's Stortford	Planning agent	This site forms a small part of parcel 60a (Green Belt Review). Whilst, parcel 60a as a whole makes contribution to the Green Belt, this is not true for 01/030. 01/030 should accordingly be re-assessed given its lack of visual relationship with the remainder of the parcel.	Not agreed, it is not considered that development in this location is appropriate. This was also the view of the Inspector during the Examination of the adopted Local Plan 2007. In particular, the Inspector states that development of the site would lead to 'a protruding developed wedge, poorly related to the form and pattern of the settlement on the southern edge of the town'. It is not considered that the situation has changed.
01/161	Bishop's Stortford	Planning agent	It is accepted that land adjacent to the railway line has no development potential. However, the eastern part of the site lies outside of the flood plain. Further investigation is ongoing to determine the extent of land that is not subject to flooding, following this a planning application will be submitted. At this stage the	Not agreed. The site in its entirety forms a visual and functional link with the riverscape, and as such, is not considered to be suitable. This position is consistent with the views of the Inspector for the Examination of the adopted Local Plan 2007.

Site Ref	Settlement	Respondent	Issue/Comments	Officer Response
			principal of development should not be ruled out.	
02/005	Buntingford	Site promoter/landowner	It is stated that Buntingford West could be developed in the first five years. There are no infrastructure constraints with regards to utilities or road network. The County Council confirmed the need for a 2FE school site (2014), this proposal includes provision for the school. A site search by HCC failed to identify any other viable alternatives to this site.	It is noted in the SLAA assessment that there is potential for development in this location subject to a review of the settlement boundary. This site will be considered in detail through the Settlement Appraisal for Buntingford.
02/011	Buntingford	Planning agent	The site has an area of 0.7ha and hence the suggested capacity of 83 dwellings is wholly unrealistic. A maximum of 20 dwellings is more viable.	Noted. The figure of 83 dwellings was included in error. This has been amended to 22 dwellings based on a standard density assumption of 30 dwellings per hectare.
03/001 & 03/120	Hertford	Planning agent	There must be serious doubts about these sites. The adopted Minerals Plan notes Rickneys Quarry as a preferred area for mineral extraction and it is national policy not to sterilise minerals by other forms of development. The assumption is gravel extraction will take place in the next few years. In these	The issues regarding minerals extraction in this location will be addressed in detail through the Settlement Appraisal for Hertford. For the high level, strategic SLAA assessment it has been concluded that the sites could come forward subject to a review of the Green Belt.

Site Ref	Settlement	Respondent	Issue/Comments	Officer Response
			circumstances, the sites are unlikely to be achievable.	
03/016	Hertford	Site promoter/land owner	Similar to the Mead Lane Industrial Estate, which was allocated for residential development in the Local Plan Second Review, Dicker Mill is considered more suitable for residential use than employment use. It is within a primarily residential area and is a highly sustainable location. The site is available for development. In addition, existing adopted policies regarding retention of employment areas are out of date.	Not agreed. The existing employment offer in Hertford is limited and the Council's evidence base suggests that existing employment areas should be maintained wherever possible.
03/017	Hertford	Site promoter/land owner	The site is outside the allocated employment area show on the Draft Plan Proposals Map. Similar to the Mead Lane Industrial Estate, which was allocated for residential development by the Local Plan Second Review, this site is considered more suitable for residential use than employment use. It is within a primarily residential area and is a highly sustainable location.	The existing employment offer in Hertford is limited and the Council seeks to maintain existing employment uses where possible. As such the site is considered unsuitable. However, the site is not within a designated Employment Area and so it is recognised that it could become available for re-development in future following satisfactory marketing of the site for continued employment use.
03/152	Hertford	Site promoter/landowner	This site is capable of delivery of 350 dwellings, as opposed to the 300 suggested in the SLAA.	The SLAA identifies the principle of development in this location subject to a review of the Green Belt. However,

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			Although, the site currently lies within the Green Belt, this can be reviewed as part of the emerging District Plan.	more detailed issues such as capacity will be dealt with through the Settlement Appraisal for Hertford.
03/156	Hertford	Site promoter/landowner	The employment categorisation for this site needs reconsidering. As an employment site this area is no longer fit for purpose and it will soon be vacant. Also the site does not enhance the amenity for what is now becoming a residential area.	Not agreed. The existing employment offer in Hertford is limited and the Council's evidence base suggests that existing employment areas should be maintained wherever possible.
04/005	Sawbridgeworth	Site promoter/landowner and Town Council.	From the comments on 04/005 it would appear that the whole site including the Orchard and County Wildlife Site has been assessed and not just the proposed development area.	Noted. The SLAA assessment has been updated to reflect the smaller proposed development area. However, the Settlement Appraisal for Sawbridgeworth indicates that this site is considered to be less preferable than the proposed allocations in the town.
04/018	Sawbridgeworth	Site promoter/landowner	The Orchard and County Wildlife Site is only deliverable for community use through enabling development of the retirement home scheme.	Noted. However, residential development of this site is considered to be less preferable than the proposed allocations.
04/006	Sawbridgeworth	Planning agent and Town Council	It has been agreed at officer level that this site be allocated for 175 dwellings, the SLAA should reflect this.	Noted and agreed.
04/008	Sawbridgeworth	Town Council	It is noted that since the review was published EHC's view has changed and the area is now considered	The SLAA considers the merits of the site in isolation. However the assessment does note that there is

Site Ref	Settlement	Respondent	Issue/Comments	Officer Response
			suitable.	potential for development if considered in conjunction with neighbouring land.
04/010	Sawbridgeworth	Site promoter/landowner	The assessment of this site is clear that development would not reduce the strategic gap, yet the site is discounted on this basis, this is clearly not a justified approach.	Not agreed. The assessment indicates that further urbanisation of this particularly sensitive parcel of Green Belt should be avoided.
04/010	Sawbridgeworth	Site promoter/land owner	Other sites have been identified suitable, subject to removal of Green Belt designation, even where the Green Belt review has found them to be unsuitable. For example, sites 04/006 and 04/013 have been assessed as suitable despite being part of land parcels considered to have low suitability for development in the Green belt review. Site 04/010 has been assessed negatively on the basis of Green Belt designation. This conclusion is inconsistent with the treatment of other sites.	Not agreed. The Green Belt Review did assess very large parcels of land. However, in assessing smaller areas for development, it is considered that the proposed allocations are less sensitive in Green Belt terms than land to the south west of the town. Given the existing narrow gap between Sawbridgeworth and Harlow/High Wych, it is considered that any development in this area would cause significant harm.
04/013	Sawbridgeworth	Planning agent	Using a density of 25DPH the capacity of this site would be 118, considerably less than the 125 figure stated. In addition, the topography of the land appears to have been disregarded. For this reason the site should be listed for no more than 100 units.	Not agreed. Even after taking account of using 1.2 hectares for primary school expansion, there is sufficient land to deliver 125 dwellings.
04/013	Sawbridgeworth	Town Council	It is noted that since the review was	Noted.

Site Ref	Settlement	Respondent	Issue/Comments	Officer Response
			published the scale of involvement on this site has increased from 100 units to a greater figure.	
04/015	Sawbridgeworth	Site promoter/landowner	The site is largely previously developed land, which was previously allocated for residential development. The inspector saw no reason to reject the proposal on Green Belt grounds and saw merits of retaining a buffer to the east to improve the river landscape and prevent coalescence. There is no justification to consider the site any differently to the inspector.	Not agreed. The Inspector for the Examination of the adopted Local Plan 2007 agreed with the SLAA assessment in that development in this location would be damaging to the integrity of the Green Belt and to its function.
04/015	Sawbridgeworth	Site promoter/landowner	The Esbies site has greater overall merits than the West Road and Kecksys Farm sites. It has close proximity to the railway station, good access to bus services and there is the potential to enhance the nearby conservation area and River Stort landscape.	The Green Belt concerns with regards to this site are considered justified. Land to the north of the town was concluded to have 'high suitability' for development by the Green Belt Review. Development in that location would not cause coalescence issues or harm the environment of the riverscape.
04/056	Sawbridgeworth	Planning agent	Using a density of 25DPH, the capacity of this site would be 63. There is concern raised around whether there has been any published evidence which indicates this site has the capacity for 76 dwellings.	A standard density of 30 dwellings per hectare has been used in the SLAA in relation to sites on the edge of towns, including Sawbridgeworth.

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04/056	Sawbridgeworth	Town Council	It is noted that since the review was published EHC's view has changed and the area is now considered suitable for development.	Noted.
05/001	Ware	Planning agent	A landscape assessment undertaken in 2005 concluded that the site would be capable of development, whilst leaving the character of the surrounding area unchanged. Since that assessment the woodland has had 10 years of further growth, thus enhancing the visual containment of the site. Therefore, it should be acknowledged that the site would not have an impact on Green Belt purpose. The Hertford and Ware Employment Study 2016 portrays that the number of available jobs in the town is decreasing. The Presdales Pit could offer good quality B1 floor space that has easy access to the A10/A414 corridor.	Not agreed. It is considered that any development of this location would cause significant harm to this particularly sensitive parcel of Green Belt which helps to maintain the distinct identities of Ware and Great Amwell.
05/003	Ware	Site promoter/land owner	This site appears to be consistently rejected due to its listed status and the inability of Historic England to reconsider. A historic landscape assessment was undertaken on the site in 2012. The assessment found that the site was now divorced from	The site remains as part of the Historic Park and should be assessed as such. Further detail is provided in the Settlement Appraisal for Ware.

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			its parent landscape and divided by the dual carriageway.	
N/A	Ardeley	Planning agent	Ardeley warrants group 2 status in the village hierarchy.	This issue is not addressed by the SLAA.
10/001	Aston	Site promoter/landowner	Planning permission has been granted for 1 detached dwelling but development has not proceeded. The site is more appropriate for 5 or perhaps 10 dwellings (dependant on the building line). The site is still available for development.	Noted. This is reflected in the SLAA assessment.
10/001	Aston	Planning agent	A planning application in 2012 was withdrawn due in part to the loss of parking spaces. Hence, this site is unlikely to bring forward more than 3 dwellings.	Noted. The SLAA is a high level assessment based on a generic density of 25 dwellings per hectare in the villages.
10/003 & 10/004	Aston	Planning agent	These sites would not represent incursions into the countryside. A landscape assessment undertaken in 2014 for the sites does not look to have been given consideration.	Not agreed. It is considered that the Green Belt performs an important function in this location. In addition, the SLAA assessment indicates that development of these sites would not constitute infill development in a Green Belt village.
18/001	Buckland	Site promoter/land owner	Further consideration should be given to this site, taking account of NPPF. The proposed scale of development would be proportionate and appropriate to the existing settlement.	The Council has updated its position on village development. The revised policy will state that limited development can be delivered in Group 3 villages if identified through a Neighbourhood Plan. This could be the case for this site, however for consistency, the site

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				has not been assessed as it falls below the threshold of 0.25 hectares.
20/010	Datchworth	Planning agent	Objection appears to be to the scale of the site. However, this should not preclude consideration being given to the suitability of a smaller development.	Noted. The assessment has been updated to reflect the fact that a smaller scale of development could be more acceptable in Green Belt terms but would not constitute infill development in a Group 2 village.
21/004	Eastwick & Gilston	Site promoter/landowner	Support for the draft conclusion. This site is being jointly promoted with 29/004.	Support noted and welcomed.
22/003	Furneux Pelham	Planning agent	This site forms a small part of a large field. There would be no adverse impact on the agricultural operation by separating it from the field and developing it. Access into the field together with a good landscaping screen along the southern boundary would mitigate any impact from Barleycroft Works.	The assessment has been updated to reflect the revised village strategy wherein development in this location could come forward if identified within a Neighbourhood Plan.
22/004	Furneux Pelham	Planning agent	This site has been sold and is unlikely to still be available.	Noted although the Council doesn't have any information to suggest that the site isn't available.
23/002	Great Amwell	Planning agent	Opposition to the comment that Great Amwell is a small village; in geographical terms it is quite large albeit somewhat sprawling and it includes a range of employment	Not agreed. Development would not constitute infill development in a Group 2 village.

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			facilities. Hence, sensitive development of this site would not be out of scale with the village.	
25/001	Hertford Heath	Planning agent	Opposition to the comment that development of the site would be out of scale with the village. Given that Hertford Heath is one of the District largest villages, development of this site would be well within the Council's 10% target for group 1 villages. Consideration needs to be given to the detailed submission of the Vision Statement made in Spring 2014.	Not agreed. Development in this location would represent an unacceptable incursion into the Green Belt. The village is inset from the Green Belt and London Road currently presents a strong Green Belt boundary that should not be breached. While identified as a Group 1 village, Hertford Heath is not required to deliver 10% growth due to a lack of suitable sites.
25/007	Hertford Heath	Planning agent	Having been within the defined village boundary since before the adoption of the current Local Plan there has been plenty of opportunity for this land to be brought forward yet this has not happened. Therefore, it is unlikely to come forward in the future and should not be regarded as achievable.	Noted. This site has now been deleted from the SLAA. It was identified through the Housing Capacity Assessment (HCA) and, as with most HCA sites their availability is unclear. As they are highly unlikely to become available, all HCA sites have been removed from the SLAA.
26/003	Hertingfordbury	Site promoter/landowner	The total area of land being promoted by landowner is circa 100 hectares (within East Herts) and forms part of a larger cross boundary site of 260 hectares. This should be reflected in the SLAA.	Noted and agreed.

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26/003	Hertingfordbury	Site promoter/landowner	The proposed development would be delivered in line with policy HA3 (draft District Plan), hence its designation as an AAS would not limit the suitability of the development. The site is both suitable and available for development during the plan period and should therefore be assessed as "suitable" in the draft conclusions.	Reference to Areas of Archaeological Significance has been removed. The site cannot currently be considered to be 'suitable' due to its location within the Green Belt.
26/003	Hertingfordbury	Site promoter/landowner	Response under column "Deliverable with policy change" is endorsed.	Support noted and welcomed.
28/005	Hormead	Planning agent	This site is subject to a planning application for 5 dwellings which is supported by evidence that it is no longer suitable for employment use. The site has not been occupied for 10 years. The SLAA should be amended to include this site for 5 dwellings.	For the purposes of the SLAA it is considered that development in this location is unsuitable. This does not preclude the Council from taking a different decision through the planning application process should other material considerations weigh in its favour.
29/001	Hunsdon	Planning agent	It is accepted that the site would more than double the size of the village if developed in its entirety. Consideration has not been given to bringing forward a smaller site behind development in Tanners Way. It is considered that 40 dwellings are achievable. It has	Noted. The site has been re-assessed and the conclusion now indicates that the south eastern section of the site could be suitable for small scale development subject to inclusion in a Neighbourhood Plan.

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			been noted that “a small scale of development could be considered by the Parish Council as part of the work on the emerging Neighbourhood Plan”. This should be noted in the SLAA.	
29/001 , 29/002 & 29/019	Hunsdon	Parish Council	Support for the draft conclusions.	Noted although the assessment for 29/001 has been updated to reflect that the site could come forward through a Neighbourhood Plan.
29/003	Hunsdon	Parish Council	Support for this site, however it is questioned whether 30 houses could be built in this area. This density would not be appropriate for this part of the village.	Noted. The SLAA has used a generic density assumption of 25 dwellings per hectare for village sites.
29/003	Hunsdon	Planning agent	Industrial units on the site currently provide income for a business located there which would be lost if residential development was to come forward. Concerns raised over the numerous land ownerships.	Noted. The conclusion has been amended to ‘Developable with policy change’ in order to reflect the fact that the site is not necessarily available due to its current use, and that it would need to come forward through a Neighbourhood Plan.
29/003	Hunsdon	Planning agent	The comment that the site is currently designated as an employment area is factually incorrect.	The assessment states that the site is not a designated Employment Area.
29/004	Hunsdon	Parish Council	This site is Green Belt and good quality farming land it should remain this way.	Strategic scale development in this general location will be considered through the Gilston Area Settlement

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				Appraisal which will be presented to District Planning Executive Panel on 8 th September.
29/004	Hunsdon	Site promoter/land owner	Support for the conclusion. The site is being promoted together with 21/004 for a joint allocation of circa 10,000 homes.	Noted.
29/005 , 29/015 , 29/018 & 29/020	Hunsdon	Parish Council	EHDC has already granted outline planning permission for these sites.	Noted. The assessments have been updated.
29/017	Hunsdon	Parish Council	This site should not be considered part of the scheme north of Harlow. It is north of the historic settlement which contains the village church, Hunsdon House and Nine Ashes, and as such it should remain as part of Hunsdon.	Reference to a strategic scheme has been removed.
29/017	Hunsdon	Parish Council	This proposal has serious implications for the surface water drainage in an area which is prone to flooding.	The Councils records show that only small areas of the site are at risk from surface water flooding. However this issue will be considered through the current planning application.
29/017	Hunsdon	Planning agent	The SLAA comment under "Available" is misleading as the use of the site as a crane depot had ceased by 1990 and there has been	Noted although for the purposes of the SLAA assessment, employment was still the previous use. This issue will be considered through the current

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			no active use for several years.	planning application.
29/021	Hunsdon	Parish Council	The SLAA mapping shows parcels 29/021A and 29/021B, however the spreadsheet only refers to 29/021, this makes the assessment comments unclear.	The site was submitted in its entirety, therefore the mapping is incorrect and will be amended.
29/021	Hunsdon	Parish Council	This site could not support 50 houses, this figure is inappropriate and out of keeping with other development nearby.	Noted, this has been changed to 30 dwellings for consistency with other assessments.
29/021	Hunsdon	Planning agent	It is not clear from the SLAA mapping which parcel of land this reference refers to. The northern site (north of The Rectory/east of Tudor Close) was included as a recreation ground as part of a planning application for a new chapel for Hunsdon Parochial Church Council. Hence the area is not available. The southerly sites would lead to outward sprawl of the village.	It is considered that part of the site adjoining the current boundary could be suitable for up to 30 dwellings subject to inclusion in a Neighbourhood Plan.
29/021	Hunsdon	Site promoter/landowner	This site is considered capable of accommodating 40 dwellings, landscaping and infrastructure. Concern is raised that the site can only come forward through	A Neighbourhood Plan is currently in the early stages of preparation. The site can be considered through this process. The Gilston Area development is being progressed

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			amendment to the settlement boundary through the Neighbourhood Plan process. This particular Neighbourhood Plan could be very complicated due to the Gilston/Harlow North proposals. There is a concern the site could become delayed or lost within the wider Harlow North/Gilston discussions.	separately through the District Plan.
29/022	Hunsdon	Parish Council	This site is Green Belt and should remain so. However, this location has certain advantages over the development of other SLAA sites closer to the village settlement.	Noted.
31/004	Little Hadham	Planning agent	The site has been sold since it was promoted through call for sites and may no longer be available.	Noted although the Council has no information to suggest that the site is no longer available.
31/004	Little Hadham	Planning agent	The capacity of the site would be significantly less than 30 dwellings. Access issues also need to be resolved and involve crossing third party land.	Noted. However following further consideration of this site, the assessment has been updated to state that it is unsuitable.
31/004 , 31/006 & 31/028	Little Hadham	District Councillor	There are references to Little Hadham being a Group 1 village, however in the latest village hierarchy it has been downgraded to Group 2. This requires amending.	Noted. At the time of the stakeholder consultation the emerging village strategy was unclear. It is now proposed that Little Hadham will be identified as a Group 2 village. Therefore the assessments have been

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				updated to reflect this.
33/004	Much Hadham	Planning agent	Support for the draft conclusion.	Support noted and welcomed.
33/004 & 33/012	Much Hadham	Parish Council	It should be stated that ribbon development is a further reason why these sites are unsuitable, as it would be contrary to VILL1 VI (e) of the Preferred options.	Given the location of existing buildings it is not considered that development of these two sites would be wholly unreasonable, particularly given the existing built form of Much Hadham and Hadham Cross. However, it is for the Parish Council to determine which sites are favourable through the preparation of a Neighbourhood Plan.
33/013 & 33/014	Much Hadham	Parish Council	Housing numbers to the suggested density would represent a huge intensification of highways usage, for which New Barns Lane and the junction with B1004 could not handle. Thus it must be recognised that accessibility is an issue that has no feasible solution. The sites should be assessed as “No” under deliverable with policy change as the NP would not be able to amend the boundary to include these sites, as they have no development potential.	The SLAA is a high level assessment based on generic density assumptions. More detailed issues need to be considered through the Neighbourhood Planning process. However the assessments have been updated to indicate that access issues would need to be overcome.

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33/015	Much Hadham	Parish Council	Housing numbers to the density suggested would represent huge intensification of highways usage, for which Kettle Green Lane and the junction with B1004 could not handle. Thus it must be recognised that accessibility is an issue that has no feasible solution.	The SLAA is a high level assessment based on generic density assumptions. More detailed issues need to be considered through the Neighbourhood Planning process. However the assessment already indicates that access issues would need to be overcome.
33/015 a	Much Hadham	Parish Council	There is no suitable access to this site. It is dependent on prior development approval for the remainder of the Old Station Yard (33/016) and this ought to be noted.	The SLAA is a high level assessment based on generic density assumptions. More detailed issues need to be considered through the Neighbourhood Planning process. However the assessment already indicates that access issues would need to be overcome.
33/015 a	Much Hadham	Much Hadham residents (petition)	Opposition to this site being developed as: <ul style="list-style-type: none"> • Construction would be detrimental to the rural character and approaches to a village that is renowned for its visual character. • All approach roads are congested. • It is a valuable green space and there are numerous and rare species of bat that use this area as habitat. 	Noted. It is the role of the Parish Council to determine favourable sites through the Neighbourhood Planning process.

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33/016	Much Hadham	Parish Council	The SLAA should recognise that this site has been classified as not for development by the Hertfordshire Ecological network mapping project. It should be noted that this site is a listed habitat within S41 of the NERC Act and should not be developed.	The SLAA assessments take into account a range of policy constraints. However, further consideration of constraints would need to take place as part of the more detailed site assessment process. In this case, this would take place through the Neighbourhood Plan process.
N/A	Much Hadham	Parish Council	VILL 1 of the Preferred Options states that development outside the village boundary would be prevented until an NP is made. This means that development of any SLAA sites in Much Hadham will not commence until the NP is in place.	The draft policy does state that development should be limited to the existing urban area of a village until a Neighbourhood Plan is in place. However, when planning applications are submitted other material considerations should be considered. The fact that the Council is unable to demonstrate a 5 year supply of land at present is given significant weight in favour of development proposals.
35/004	Standon	Planning agent	Given the level of opposition to this site, particularly with regards to the fact the proposal is for 101 dwellings (close to the target for the whole settlement), it is extremely unlikely that the site will prove acceptable by local residents and be included in neighbourhood plan.	The does provide the potential meet the 10% growth requirement for Standon and Puckeridge. However, it is the role of the Parish Council to determine the most suitable sites to achieve this.

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35/017	Standon	Planning agent	The comments under suitability are supported. However, the capacity potential of this site is higher than the figure of 23. The current layout of 29 dwellings confines all development to flood zone 1.	Noted. The SLAA has used a generic density assumption of 25 dwellings per hectare for village sites.
35/036	Standon	Planning agent	This site is much better related to the existing High Street than either 35/004 or 35/016 and would bring forward modest development more likely to be absorbed into the community.	It is noted that the site is well related to the existing settlement, particularly as a result of recent development. However, the site is part of a Scheduled Monument designation and development should be avoided.
35/036	Standon	Planning agent	Whilst it is correct to state that the site is part of a scheduled monument, the same designation applies to all the historic core of the village including 35/016 and most of 35/004. Hence it is not logical to imply that this designation is a constraint to development of 35/036 and not to 35/004 and 35/016.	Site 35/004 is not within a Scheduled Monument Designation. Part of 35/016 is, but the SLAA assessment for that site indicates that development would be inappropriate in that location.
36/002	Stanstead Abbots	Site promoter/land owner	Given the high sustainability of Stanstead Abbots and St Margarets it is not considered that the Green Belt and Lee Valley Regional Park designations should be seen as automatic barriers to development.	The Council recognises that a review of the Green Belt is necessary in order to meet housing needs. However development of the Lee Valley Regional Park should be avoided. A number of sites around the village also lie in Flood Zone 3.

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36/002	Stanstead Abbotts	Site promoter/land owner	The site has been identified within flood zones 1 and 2, with a small parcel in flood zone 3a.	Not agreed. The majority of the site is Flood Zone 2 with small areas of Flood Zone 3.
36/007	Stanstead Abbotts	Planning agent	Support for the recognition that the site is well related to the village boundary. It is not accepted that location within the Green Belt automatically makes it unsuitable for development.	Agreed. However the site also lies in the Lee Valley Regional Park which is considered to be a significant constraint to development.
36/007	Stanstead Abbotts	Planning agent	Reference to a comprehensive submission that considers the principle of development within the Lee Valley Regional Park.	The content of this document is noted. However, it is the view of the Council at this stage that development within the boundaries of the park should be avoided.
37/002	Stanstead Abbotts	Site promoter/landowner	The site should be released from the Green belt and allocated for between 140 and 300 dwellings. Or it could become part of a larger development combining this site with land immediately adjacent to the east of the A1170. In Green Belt terms the site when compared to competing Green Belt sites (Gilston, East of WGC and North and East of Ware) performs a lesser Green Belt function. Landowners are willing to undertake a more detailed landscape and visual critique, in which a mitigation strategy for minimising the coalescence of the	It is not agreed that this site performs a less significant Green Belt function than other locations listed. This is a particularly sensitive parcel of Green Belt, given that it prevents coalescence of multiple settlements. As such development should be avoided.

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			site with Hoddesdon could be presented.	
N/A	Stanstead Abbots	Site promoter/land owner	Objection to the demotion of Stanstead Abbots and St Margarets to a group 2 village. The SLAA is incorrect to dismiss development given the settlement scores significantly higher than all other villages in terms of sustainability.	In is noted that this is the most sustainable village in the District in terms of services and facilities, and as such, has been identified as a Group 1 village. However, given the constraints that exist, it is not considered appropriate to require 10% growth in this location.
40/001	Tewin	Planning agent	This land warrants careful attention as it provides the only opportunity to expand the school during the plan period. In 2013 Tewin Cowper C of E was listed as having no expansion potential, however it was stated: "Possible expansion potential, if adjacent land not in HCC ownership allocated in LDF. Need to investigate further". It is disappointing three years later this has not been investigated.	Tewin is identified as a Group 2 village within the District Plan. As such, development in this location would be contrary to policy.

Site Ref	Settlement	Respondent	Issue/Comments	Officer Response
40/003 40/008	Tewin	Site promoter/land owner	Promotion of land, given sustainability of site and the overall sustainability of Tewin as a village. The site has previously been identified as being suitable for rural exceptions development.	The merits of this site are noted, as is the fact that it was previously identified by this Council as a proposed allocation as part of work on the adopted Local Plan 2007. However, Tewin is identified as a Group 2 village within the District Plan, and as such a review of the Green Belt is not appropriate in this location.
40/003	Tewin	Site promoter/landowner	The site does not have one owner as stated, it is important to note that the site is divided into two separately owned sections.	Noted.
40/003	Tewin	Site promoter/landowner	There are other sites that are adjacent to group 2 villages that have been suggested as suitable for development. For example, 10/001, 10/007, 19/003, 31/004, 31/007, 31/006, 31/028.	The site assessments for these locations indicate that they either represent limited infill development in a Green Belt village, or they are in non-Green Belt locations where sites could be brought forward through Neighbourhood Plans. This site is not considered limited infilling in a Green Belt location, and could not come forward through a Neighbourhood Plan. This site would not be in conformity with Group 2 policy.
40/004	Tewin	Planning agent	This site should be carefully considered for development through a review of the Green Belt boundary.	The site would not constitute limited infilling in a Group 2 village.

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40/005	Tewin	Planning agent	This site seems to have disappeared from the SLAA. A site plan is attached.	The site was omitted at an earlier stage as it falls below the threshold of 0.25 hectares used in the SLAA.
N/A	Tewin	Site promoter/landowner	Tewin should be a group 1 village instead of a group 2 village. The only reason given for Tewin not being a group 1 village is that the SLAA does not identify any capacity in Tewin, which would be the case at present as the village boundary has been drawn too tightly. This answer is insufficient to deny Tewin group 1 status. The village has close proximity to Welwyn Garden City, a primary school with available places and local commercial/industrial employment opportunities, therefore Tewin should have group 1 status.	This issue is not addressed through the SLAA. However, the emerging Village Hierarchy Study identifies that based on the scoring assessment of services and facilities, Tewin should be Group 2.
41/002	Thorley	Site promoter/landowner	This site is simply listed as 'residential', when in reality the proposals are likely to compromise Residential, Affordable housing, Employment, Education, a Local Centre and Open Space. We would be grateful if you could update this entry to reflect the mix of uses at Whittington Way.	Noted and agreed.

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42/002	Thundridge	Planning agent	Opposition to the failure to upgrade Thundridge to a group 1 village as identified by the Local Plan inspector. Therefore, the SLAA conclusion is also objected to.	This issue is not addressed through the SLAA. However, the emerging Village Hierarchy Study identifies that based on the scoring assessment of services and facilities, Thundridge/Wadesmill should be Group 2.
42/009	Thundridge	Planning agent	This site was deleted by the Local Plan Inspector previously because there were serious constraints to using North Drive for access. This situation has not changed. Hence, the site should not be included in the SLAA for up to 18 dwellings.	Given that High Cross is now identified as a Group 2 village, this site is now considered to be unsuitable.
42/010 & 42/011	Thundridge	Planning agent	Support for the conclusion that these sites are suitable for employment use. However, concern is raised that these sites should be brought forward through a Neighbourhood Plan. At the time of writing Thundridge Parish Council have not requested to have any part of its administrative area designated for Neighbourhood Planning purposes. These sites should be brought forward through the District Plan for certainty and deliverability.	The Council is not proposing to allocate village sites through the District Plan. Neighbourhood Plans will deliver the limited amount of growth proposed for rural locations. This is considered to be a reasonable approach.
42/014	Thundridge	Planning agent	Support for the draft conclusion that this site is suitable for 22 dwellings. However, concern is raised that this site should be brought forward	The Council is not proposing to allocate village sites through the District Plan. Neighbourhood Plans will deliver the limited amount of growth proposed for

Site Ref	Settlement	Respondent	Issue/Comments	Officer Response
			through a Neighbourhood Plan. At the time of writing Thundridge Parish Council have not requested to have any part of its administrative area designated for Neighbourhood Planning purposes. To ensure deliverability this site should be allocated in the District Plan.	rural locations. This is considered to be a reasonable approach.
42/017	Thundridge	Planning agent	This site was deleted by inspector previously because there was no satisfactory access available to the site. Nothing has changed. Hence the sites should not be included in the SLAA for up to 20 dwellings.	High Cross is identified as a Group 2 village. Therefore this site is now considered to be unsuitable as development would not constitute limited infilling.
42/034	Thundridge	Planning agent	This site should not be included in the SLAA for up to 30 dwellings on the basis the constraints to access along North Drive cannot be overcome.	High Cross is identified as a Group 2 village. Therefore this site is now considered to be unsuitable as development would not constitute limited infilling.
43/002 & 43/003	Walkern	Parish Council	These sites are located in Green Belt land that acts as a buffer between Stevenage and Walkern to prevent urban sprawl and coalescence. Green belt review did not call for this site to be developed.	Noted. Strategic development in this location is considered through the East of Stevenage settlement appraisal.
43/002 & 43/003	Walkern	Parish Council	Infrastructure nearby to this site is insufficient. Increase in road congestion, destruction of green corridors and impact on the Beane Valley are all reasons this site is	Noted. Strategic development in this location is considered through the East of Stevenage settlement appraisal.

Site Ref	Settlement	Respondent	Issue/Comments	Officer Response
			unacceptable.	
43/009	Walkern	Parish Council	Planning inspector has granted permission for up to 85 homes, this requires amendment.	Noted
43/009	Walkern	Planning agent	The site was granted outline planning permission on appeal for up to 85 dwellings. The SLAA entry of up to 47 houses considerably underestimates the capacity.	
43/010 & 43/011	Walkern	Parish Council	Parish Council has no intention of reviewing its current village boundary. Following permission of 85 dwellings (43/009), it is clear Walkern has already exceeded its housing quota for up to 2031.	Noted.
43/010 & 43/011	Walkern	Site promoter/land owner	Both sites remain available, deliverable and developable with immediate effect.	Noted.
45/003	Watton-at-Stone	District Councillor	Although this site is below the threshold, it should be included as it is effectively derelict.	Not agreed. This threshold has been used throughout the SLAA. However smaller sites can still be considered through the Neighbourhood Plan process. In accordance with national policy, suitable brownfield sites should be brought forward for development before greenfield/Green Belt sites are considered.

Site Ref	Settlement	Respondent	Issue/Comments	Officer Response
45/004	Watton-at-Stone	Planning agent	Support for the draft conclusion.	Support noted and welcomed.
N/A	Watton-at-Stone	District Councillor	Sites at Mill Lane, Watton-at-Stone and Moat Farm House, Perrywood Lane, Watton-at-Stone have been suggested for inclusion in the SLAA.	The sites have not been submitted through the Call for Sites process. However, Parish Councils are not limited to considering SLAA sites only through Neighbourhood Planning. It is recognised that other sites might be suitable for development. In accordance with national policy, suitable brownfield sites should be brought forward for development before greenfield/Green Belt sites are considered.
47/011	Widford	Site promoter/landowner	It is incorrect to state that this site is not deliverable or developable with a policy change. If the site was removed from the countryside it would clearly be developable and deliverable in policy terms.	Widford is identified as a Group 2 village. As such development in this location would not constitute limited infilling. However, the assessment has been updated to state that the site could come forward if identified within a Neighbourhood Plan for Widford.
47/011	Widford	Site promoter/landowner	Widford is currently identified as a category 2 village but it is noted that Preferred Options identifies Widford as a group 1 village suitable for accommodating 10% growth. This 10% could not be accommodated on brownfield land and would require greenfield release. There are also advantages of developing	Widford is identified as a Group 2 village. As such development in this location would not constitute limited infilling. However, the assessment has been updated to state that the site could come forward if identified within a Neighbourhood Plan for Widford.

Site Ref	Settlement	Respondent	Issue/Comments	Officer Response
			larger sites (land South of Martlets), as such sites can contribute to infrastructure delivery.	
47/011	Widford	Site promoter/landowner	The identification of Widford as a category 2 village is not supported. It is not recognised that Widford functions as a group village with Much Hadham and Hunsdon. These villages are connected by public transport, footways and the B1004/B180. It is incorrect to disregard the interaction between the villages. Rescoring of Widford with amendments would qualify Widford as a category 1 village.	This issue is not considered by the SLAA.

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SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
01/001	Bishop's Stortford Town	2.89	N - This greenfield site is located in the Green Belt outside of the settlement boundary. The site is wholly within Flood Zone 2 with the eastern part in Flood Zone 3 wherein development would not be suitable. Recognising the amenity, wildlife and leisure value of the 'green finger', the Council has designated this area as a Local Green Space in the emerging District Plan. The site is therefore unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
01/002	Bishop's Stortford Town	0.0587	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
01/003	Bishop's Stortford Town	0.42	N - This site is currently located in the Green Belt, outside of the settlement boundary. Located adjacent to an existing employment area, the site is considered suitable for employment use, subject to a change in policy.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			The site is considered deliverable subject to a review of the Green Belt.	
01/004	Bishop's Stortford Town	8.07	Site not assessed as permission has been granted and the principle of development is therefore accepted.						
01/005	Bishop's Stortford Town	0.7	Y - This brownfield site is located within the settlement boundary. It is currently in employment use although not designated as an Employment Area within the Local Plan. The site is considered to be suitable for residential development subject to marketing of the site.	N - Whilst the site has been promoted through the Call for Sites process, site is currently in employment use and is not considered available.	Y – Site is considered achievable.		Up to 21 dwellings The site is considered developable subject to consideration of existing employment use.		
01/006	Bishop's Stortford Town	0.057	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
01/007	Bishop's Stortford Town	1.25	N - This site is currently garden land associated with the existing dwelling. The majority of the site is within Flood Zone 3. In addition, the site forms part of one of Bishop's Stortford's 'green wedges' which help to protect the historic character of the town. As such, it is considered unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
01/008	Bishop's Stortford Town	1.19	Site not assessed as permission has been granted and the principle of development is therefore accepted.						

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
01/009	Bishop's Stortford Town	0.46	Y - This largely greenfield site (garden land) is located within the settlement boundary of Bishop's Stortford. An application for 13 dwellings was previously refused and subsequently dismissed on appeal although the Inspector suggested the the principle of development in this location was accepted. The site is therefore considered to be suitable for development.	Y - The site has been promoted through the Call for Sites, and while there are multiple land ownerships it is considered to be available.	Y – Site is considered achievable.	Up to 14 dwellings The site is considered to be deliverable			
01/010	Bishop's Stortford Town	2.99	N - The site is already predominantly within leisure use as it is the site of Bishop's Stortford Football Club. There is space around the stadium which potentially could be used for other uses, particularly if the stadium is relocated on site. However, at present the site is unsuitable as it is located within the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			The site is considered deliverable subject to a review of the Green Belt.	
01/011	Bishop's Stortford Town	0.56	N - This relatively small site is located within the Green Belt, adjacent to the settlement boundary. As such it is currently unsuitable for development. However, the site is well related to the existing settlement and the Green Belt Review concluded that it has 'high' suitability for development. The site could therefore be suitable subject to a review of the Green Belt boundary.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 17 dwellings The site is considered deliverable subject to a review of the Green Belt	
01/012	Bishop's Stortford Town	0.22	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
01/014	Bishop's Stortford Town	2.12	N - The site is currently located in the Green Belt, outside of the settlement boundary and as such is currently unsuitable for development. However, there are no further policy constraints on the site and the Green Belt Review concludes that the wider area has potential for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 53 dwellings The site is considered deliverable subject to a review of the Green Belt	
01/015	Bishop's Stortford Town	0.1	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
01/016	Bishop's Stortford Town	0.1	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
01/017	Bishop's Stortford Town	3.07	N - This green field site is located within the Green Belt outside of the settlement boundary. The site is designated as 'open space' in the District Plan. Recognising the amenity, wildlife and leisure value of the 'green finger', the Council has also designated this area as a Local Green Space in the emerging District Plan. The site is therefore unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
01/018	Bishop's Stortford Town	0.14	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
01/019	Bishop's Stortford Town	1	Y - The majority of this site is within the existing settlement boundary of Bishop's Stortford. A small section is within the Green Belt. However, as the proposed use is for education, it is considered that Very Special Circumstances apply which would not require a review of the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	The site is considered deliverable for education purposes			
01/020	Bishop's Stortford Town	17.96	Site not assessed as permission has been granted and the principle of development is therefore accepted.						
01/021	Bishop's Stortford Town	0.98	Site not assessed as permission has been granted and the principle of development is therefore accepted.						
01/022	Bishop's Stortford Town	1.5	Y - This greenfield site is located to the north of Bishop's Stortford. The site is reasonably well related to existing development and this relationship will be increased following implementation of the Bishop's Stortford North scheme. In principle, the site is considered suitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	Up to 45 dwellings The site is considered deliverable			
01/023	Bishop's Stortford Town	18.78	Site not assessed as permission has been granted and the principle of development is therefore accepted.						
01/024	Bishop's Stortford Town	154.05	Site not assessed as permission has been granted and the principle of development is therefore accepted.						
01/025	Bishop's Stortford Town	0.42	Y - This brownfield site is located within the settlement boundary and as such there is no in principle objection to development in this location. In order for residential development to come forward an alternative location for the existing Air Cadet HQ would need to be found.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	Up to 11 dwellings The site is considered deliverable.			
01/027	Bishop's Stortford Town	0.47	Site not assessed as permission has been granted and the principle of development is therefore accepted.						

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
01/028	Bishop's Stortford Town	1.4	Y - This brownfield site is located in a central location. Planning permission had previously been secured but has since lapsed. Part of the site is located within Flood Zone 3 and would not be suitable for development. The rest of the site is considered suitable.	Y - The site is owned by East Herts Council which has intentions to develop the site.	Y – Site is considered achievable.	Up to 42 dwellings The site is considered deliverable			
01/030	Bishop's Stortford Town	0.93	N - This greenfield site is located within the Green Belt, outside of the settlement boundary. The Inspector to the Examination of the adopted Local Plan 2007 stated that development of this site would amount to a protruding developed wedge, poorly related to the form and pattern of the settlement. The Green Belt Review also suggested that the broad parcel plays a significant role in preventing sprawl. As such the site is considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
01/031	Bishop's Stortford Town	0.2	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
01/032	Bishop's Stortford Town	0.27	Y - This brownfield site is located within the settlement boundary. It is currently in employment use although not designated as an Employment Area within the Local Plan. The site is considered to be suitable for residential development subject to marketing of the site.	N - Whilst the site has been promoted through the Call for Sites process, site is currently in employment use and is not considered available.	Y – Site is considered achievable.		Up to 8 dwellings The site is considered developable subject to consideration of employment uses.		
01/033	Bishop's Stortford Town	4.68	N - This greenfield site is located within the Green Belt, outside of the settlement boundary. The majority of the site is located within Flood Zone 2 wherein the Sequential Test would need to be applied. The Green Belt Review states that this broad area plays a significant role in preventing sprawl and the site is also poorly related to the existing urban area. As such the site is considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
01/042	Bishop's Stortford Town		Site not assessed as this is a proposal for open space and is not a proposal for development.						
01/043	Bishop's Stortford Town	1.39	Site not assessed as permission has been granted and the principle of development is therefore accepted.						

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
01/119	Bishop's Stortford Town	1.42	Y - This brownfield site is located within the settlement boundary and was previously allocated for development within the adopted Local Plan. It is currently in employment use although not designated as an Employment Area within the Local Plan. The site is considered to be suitable for residential development subject to marketing of the site.	N - Whilst the site has been promoted through the Call for Sites process, site is currently in employment use and is not considered available.	Y – Site is considered achievable.		Up to 43 dwellings The site is considered developable subject to consideration of existing employment use		
01/120	Bishop's Stortford Town	5.25	Y - This vacant brownfield site is located within the settlement boundary and was previously allocated for development within the adopted Local Plan. The site is considered suitable for development. An application has been submitted for 682 dwellings. In addition the site has been identified within the District Plan for 400 dwellings.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	Up to 400 dwellings The site is considered deliverable.			
01/136	Bishop's Stortford Town	4.16	N - The site is currently located in the Green Belt, outside of the settlement boundary and as such is currently unsuitable for development. However, there are no further policy constraints on the site and the Green Belt Review concludes that the wider area has potential for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.		Up to 104 dwellings The site is considered deliverable subject to a review of the Green Belt		
01/139	Bishop's Stortford Town	1.45	Y - This brownfield site is located within the settlement boundary and as such there is no in principle objection to development in this location. In order for residential development to come forward an alternative location for the existing Fire Station would need to be found.	N - Whilst the site has been promoted through the Call for Sites process, site is currently in use as a fire station and is not considered available.	Y – Site is considered achievable.		Up to 44 dwellings The site is considered developable subject to relocation of the Fire Station.		
01/157	Bishop's Stortford Town	3.44	Y - This greenfield site is in use as a sports field associated with the High School and is designated under Policy LRC1 in the Local Plan. The site is considered suitable for development subject to the relocation of the sports facilities to a suitable alternative site.	N - Whilst the site has been promoted through the Call for Sites process, site is currently in use as a sports field and is not considered available.	Y – Site is considered achievable.		Up to 103 dwellings The site is considered developable subject to relocation of the sports facilities		

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
01/158	Bishop's Stortford Town	3.4	N - This green field site is located to the south of Bishop's Stortford between London Road and the railway line. At present, London Road forms a clear Green Belt boundary. While the railway line would contain development to the east there is no obvious boundary to the south of the site. However, consideration could be given to development in this location. Nevertheless, it is considered unsuitable due to its location in the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 102 dwellings The site is considered deliverable subject to a review of the Green Belt	
01/159	Bishop's Stortford Town	0.73	N - this partly greenfield site is located adjacent to the settlement boundary and north of Southern Country Park. The site is well related to the existing settlement and the Green Belt Review suggested that the broad parcel of land had 'high' suitability for development. However, at present, it is considered unsuitable due to its Green Belt location.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 22 dwellings The site is considered deliverable subject to a review of the Green Belt	
01/160	Bishop's Stortford Town	1.32	N - Whilst the site is within the settlement boundary the majority of the site is within Flood Zone 3. In addition it forms a functional link with the large open swathes of land to the west and is an integral part of the riverscape. As such the site is considered unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
01/161	Bishop's Stortford Town	1.43	N - This greenfield site is located within the settlement boundary. The majority of the site is located within Flood Zone 2 wherein the Sequential Test would need to be applied. The site forms a visual and functional link with the large swathes of open land to the west and is an integral part of the river landscape. As such the site is considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
01/162	Bishop's Stortford Town	1.58	N - This greenfield site is located to the west of the A1184 within the Green Belt. The A1184 forms a strong Green Belt boundary at present which should not be breached. In addition, the site would be relatively poorly related to the existing urban area and is considered unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
02/001	Buntingford Town	12.24	N - This greenfield site is located to the south of Owles Lane. While the site is well related to the former Sainsburys depot which is currently being re-developed, development of the majority of the site would represent a serious incursion into the countryside and would significantly harm the rural setting of Buntingford and the surrounding area. The north western section of the site, which does not extend beyond the urban form of the Sainsbury's site could be suitable. However, it lies within the Rural Area Beyond the Green Belt and, as such the site is considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 96 dwellings The site is considered deliverable subject to a review of the settlement boundary.	
02/002	Buntingford Town	18.22	Site not assessed as permission has been granted and the principle of development is therefore accepted.						
02/003	Buntingford Town	1.2	Site not assessed as permission has been granted and the principle of development is therefore accepted.						
02/004	Buntingford Town	11.73	Site not assessed as permission has been granted and the principle of development is therefore accepted.						
02/005	Buntingford Town	21.25	N - This large greenfield site is located within the Rural Area Beyond the Green Belt, between the existing urban area and the A10. The site is well related to the existing settlement and any incursion into the countryside would be limited by the presence of the A10 which would form the western boundary of the site. While the site could be considered developable subject to a review of the settlement boundary, the impact of a development of this size on existing infrastructure, and the ability to provide new services and facilities as part of the development, would need to be carefully considered. A planning application for 400 homes has been submitted.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 400 dwellings The site is considered deliverable subject to a review of the settlement boundary.	
02/006	Buntingford Town	2.78	Site not assessed as permission has been granted and the principle of development is therefore accepted.						
02/007	Buntingford Town	10.93	Site not assessed as permission has been granted and the principle of development is therefore accepted.						

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
02/008	Buntingford Town	2.14	N - This greenfield site is located to the south of Buntingford, outside of the settlement boundary. While it is well related to the existing settlement, it is currently unsuitable due to its location within the Rural Area Beyond the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 64 dwellings The site is considered deliverable subject to a review of the settlement boundary.	
02/009	Buntingford Town	17.39	Site not assessed as permission has been granted and the principle of development is therefore accepted.						
02/011	Buntingford Town	0.73	N - This greenfield site is located to the south of Buntingford, east of Aspenden Road. The site is well related to the existing settlement, particularly as land immediately to the south has recently been given permission at appeal. The site is considered to be unsuitable due to its location within the Rural Area Beyond the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 22 dwellings The site is considered deliverable subject to a review of the settlement boundary.	
03/001	Hertford Town	1.68	N- This site is located to the north of Hertford outside of the settlement boundary. While the site is well related to existing urban area it is currently unsuitable for development due to its location within the Green Belt. However, the site is part of an area proposed for development within the emerging District Plan.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 50 dwellings The site is considered deliverable subject to a review of the Green Belt	
03/002	Hertford Town	4.2	Y - This brownfield site is located within the settlement boundary of Hertford. The site is allocated for employment use within the adopted Local Plan. However, the Plan establishes the potential for residential development on land east of Marshgate Drive. As such the site is considered to be suitable for development as part of a mixed use scheme.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	Up to 193 dwellings The site is considered deliverable.			
03/003	Hertford Town	0.47	N - This greenfield site is located immediately to the east of the trainline, and is poorly related to the main built up area. The site forms part of a green finger and is located within the Green Belt. As such the site is considered unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
03/004	Hertford Town	3.04	N - This greenfield site is located to the west of the trainline and adjacent to Goldings Estate Historic Park and Garden. The site is wholly located within Flood Zone 3. The majority of the site is also located within the Green Belt. As such development in this location is considered unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
03/005	Hertford Town	4.87	N - This greenfield site is located to the south of Hertford, adjacent to Balls Park. The site is currently part of a Green Finger. However, the eastern section of the site lies between two areas of residential development and development of this section is unlikely to cause significant harm to the Green Finger. The western section of the site should be maintained as green space. Overall, the site is currently unsuitable due to its location in the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 50 dwellings The eastern section of the site is considered deliverable subject to a review of the Green Belt.	
03/006	Hertford Town	2.34	N - This greenfield site is located to the south of Hertford, immediately to the north of the A414. While the site is well related to the existing urban area, it forms part of a green finger and is located within the Green Belt. In addition, the site is covered by mature trees and adds to the character of the town in this location. As such the site is considered unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
03/007	Hertford Town	0.29	N - This greenfield site, whilst located within the built up area of Hertford, is covered by a blanket TPO (TPO No 403) and as such is considered unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
03/008	Hertford Town	0.59	Y - This brownfield site is located within the settlement boundary, east of the A414. The site could be suitable for development subject to the relocation of the Fire Station.	N - The site has been promoted through the Call for Sites. However, due to the existing uses on site, and the need for these to be relocated, the site is not currently considered to be available. Nevertheless the site could become available later in the plan period.	Y - Site is considered achievable		Up to 18 dwellings The site is considered developable subject to relocation of the Fire Station.		

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
03/009	Hertford Town	0.45	Y - This site is located within the settlement boundary and is currently in use as allotments. It is well related to existing development and is considered to be suitable for development subject to the relocation of the current use.	N - The site has been promoted through the Call for Sites. However, due to the existing uses on site, and the need for these to be relocated, the site is not currently considered to be available.	Y - Site is considered achievable		Up to 14 dwellings The site is considered developable subject to relocation of the existing use.		
03/010	Hertford Town	11.37	N - This greenfield site is located to the west of Hertford, adjacent to Panshanger Park and Garden. The site is currently located within the Green Belt and as such is considered unsuitable for development. However, the site is well related to the built up area and has been proposed for release from the Green Belt through the emerging District Plan.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.		Up to 300 dwellings The site is considered deliverable subject to a review of the Green Belt.		
03/012	Hertford Town	0.21	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
03/013	Hertford Town	0.07	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
03/014	Hertford Town	0.22	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
03/015	Hertford Town	0.07	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
03/016	Hertford Town	0.45	N - This brownfield site is located within the settlement boundary, adjacent to the River Lea. It is currently considered to be unsuitable as the site is designated as an Employment Area.	N - Whilst the site has been promoted through the Call for Sites process, site is currently in employment use and is not considered available.	Y - Site is considered achievable.	No	No	No	No
03/017	Hertford Town	0.25	Y - This brownfield site is located within the settlement boundary. While not allocated as an Employment Area, it is in current employment use. The site could be suitable for residential development subject to marketing of the site.	N - Whilst the site has been promoted through the Call for Sites process, site is currently in employment use and is not considered available.	Y - Site is considered achievable.		Up to 8 dwellings The site is considered developable subject to consideration of employment uses.		
03/018	Hertford Town	2.36	Site not assessed as permission has been granted and development is complete.						

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
03/019	Hertford Town	40.47	N - This large greenfield site forms part the Goldings Estate Historic Park and Garden. The site is poorly related to the village of Waterford. the majority of the site is identified as an area of protected open space. The site is also located within the Green Belt and as such is considered unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
03/020	Hertford Town	0.59	Y - This greenfield site is located within the settlement boundary. While the topography of the site could be challenging, it is considered to be suitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	Up to 18 dwellings The site is considered deliverable.			
03/021	Hertford Town	1.37	N - This site is part of the Goldings Estate Historic Park and Garden. The site is located within the Green Belt, isolated from the built up area of Hertford, and as such is considered unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
03/022	Hertford Town	1.54	N - This site is located in the Green Belt outside of the settlement boundary. The whole site is covered by a blanket TPO (TPO No 4). As such while the site is well related to existing urban area it is considered unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
03/023	Hertford Town	0.052	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
03/024	Hertford Town	0.42	Y - This brownfield site is located within the settlement boundary, and as such is considered suitable for development subject to the relocation of the existing use.	N - The site has been promoted through the Call for Sites. However, due to the existing uses on site, and the need for this to be relocated, the site is not currently considered to be available.	Y - Site is considered achievable		Up to 13 dwellings The site is considered to be developable subject to relocation of the existing use.		

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
03/025	Hertford Town	2.76	N - This greenfield site is located within the Green Belt to the south of Hertford and to the west of Mangrove Road. While the site is reasonably well related to the existing settlement, development would extend the ribbon of development along Mangrove Road. In addition, development of the western half of the site would extend beyond the current urban form and would harm the character of the Green Finger. As such, the site is considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
03/111	Hertford Town	7.47	This site has not been assessed as it is already in current employment use.						
03/120	Hertford Town	76.4	N - This largely greenfield site is located to the north of Hertford. The majority of the site extends well beyond the existing urban form and development of the site in its entirety would lead to an unacceptable incursion into the Green Belt, and the countryside in general. The southern part of the site, including the nursery, is well related to the existing settlement and as such could be considered developable subject to a review of the Green Belt. This part of the site has been identified as a proposed allocation within the emerging District Plan.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 150 dwellings The site is considered deliverable subject to a review of the Green Belt.	
03/134	Hertford Town	15.6	N - This large greenfield site is located within the Green Belt to the south of Hertford. The railway line forms a strong Green Belt boundary in this location and should not be breached. In addition, development would be poorly related to the existing urban area and would result in an unacceptable incursion into the countryside. As such this site is considered to be unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
03/152	Hertford Town	11.62	N - This greenfield site is located to the west of Hertford. Part of the site is a county wildlife site and would therefore be unsuitable for development. While the remainder of the site is well related to the existing urban area, it is within the Green Belt and therefore currently unsuitable. The site has been identified for development within the emerging District Plan.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 300 dwellings The site is considered deliverable subject to a review of the Green Belt.	

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
03/153	Hertford Town	1.95	N - This greenfield site is located within the Green Belt to the south of Hertford. The site forms an integral part of the Green Finger and any development would harm its openness and character by breaching the existing line of the urban form. As such the site is not considered to be suitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
03/154	Hertford Town	1.92	N - This is a greenfield site located on the edge of Hertingfordbury. The site is considered to be unsuitable as it is located within the Green Belt, on the edge of a Group 2 village. However the site could not be considered to be infill development and so would remain unsuitable under the draft Plan.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
03/156	Hertford Town	0.69	N - This brownfield site is located within the settlement boundary, adjacent to the River Lea. It is currently considered to be unsuitable as the site is designated as an Employment Area	N - Whilst the site has been promoted through the Call for Sites process, site is currently in employment use and is not considered available.	Y – Site is considered achievable.	No	No	No	No
03/157	Hertford Town	2.9	N - This brownfield site is located within the settlement boundary. The site is a designated Employment Area and forms a key part of the local employment offer. As such the site is considered to be unsuitable for development.	N - Whilst the site has been promoted through the Call for Sites process, site is currently in employment use and is not considered available.	Y – Site is considered achievable.	No	No	No	No
04/001	Sawbridgeworth Town	2.51	N - This greenfield site is located to the south of Sawbridgeworth. It is surrounded on three sides by existing development and would therefore relates well to the built up structure of the town. However, the site forms part of a wider strategic section of Green Belt that prevents coalescence of the town with Harlow. Although in itself development of the site would not reduce the gap between the two settlements, further urbanisation and reduction in openness of this strategically important area of Green Belt land should be resisted.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
04/002	Sawbridgeworth Town	0.2	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
04/003	Sawbridgeworth Town	0.21	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
04/004	Sawbridgeworth Town	4.08	N - This greenfield site is located to the south of Sawbridgeworth, part of which is within a county wildlife site. The site forms part of a wider strategic section of Green Belt that prevents coalescence of the town with High Wych. Development would directly reduce the gap between the two settlements.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
04/005	Sawbridgeworth Town	27.9	N - This greenfield site is located to the south of Sawbridgeworth. A large county wildlife site is located on the site and would not be suitable for development. The site forms part of a wider strategic section of Green Belt that prevents coalescence of the town with High Wych. Development of the site as a whole would have a significant impact on the countryside in this location. However, development of the eastern part of the site would not reduce the gap between the two settlements and could be considered suitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 120 dwellings The site is considered deliverable subject to a review of the Green Belt.	
04/006	Sawbridgeworth Town	14.19	N - This greenfield site is located to the west of Sawbridgeworth and to the south of West Road. Development would relate well to the existing urban area. However, the site is currently within Green Belt and is therefore considered to be unsuitable at present. The western part of the site is considered to be more sensitive in Green Belt terms than the eastern part and should remain undeveloped.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 175 dwellings The site is considered deliverable subject to a review of the Green Belt.	
04/007	Sawbridgeworth Town	108.84	N - This very large greenfield site is located on the western side of Sawbridgeworth. Development of the site would represent a wholly inappropriate incursion into the countryside. Furthermore the southern part of the site lies within an area of Green Belt that is of strategic importance given that it prevents the coalescence of Sawbridgeworth with High Wych. The site is therefore considered to be unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
04/008	Sawbridgeworth Town	1.04	N - This part greenfield site is located within the Green Belt on the northern edge of Sawbridgeworth. When viewed in isolation, the site is separated from the existing main built up area of the town and as such is considered to be unsuitable. However, it could be brought forward in conjunction with site 04/056.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	Up to 31 dwellings The site is considered deliverable subject to a review of the Green Belt and if brought forward with 04/056	No
04/009	Sawbridgeworth Town	8.79	N - This greenfield site is located to the south of Sawbridgeworth. The site forms part of a wider strategic section of Green Belt that prevents coalescence of the town with High Wych. Although in itself development of the site would not reduce the gap between the two settlements, further urbanisation and reduction in openness of this strategically important area of Green Belt land should be resisted.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
04/010	Sawbridgeworth Town	1	N - This greenfield site is located to the south of Sawbridgeworth. The site forms part of a wider strategic section of Green Belt that prevents coalescence of the town with High Wych. Although in itself development of the site would not reduce the gap between the two settlements, further urbanisation and reduction in openness of this strategically important area of Green Belt land should be resisted.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
04/011	Sawbridgeworth Town	4.05	N - This greenfield site is located within the Green Belt to the south of Sawbridgeworth. Development of the site would lead to the coalescence of Sawbridgeworth and Harlow. As such it is not considered suitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
04/012	Sawbridgeworth Town	5.29	N - This part greenfield site is located within the Green Belt on the northern edge of Sawbridgeworth. It has the potential to form part of the larger site alongside neighbouring land. However, when viewed in isolation, the site is separated from the existing main built up area of the town and as such is considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
04/013	Sawbridgeworth Town	5.93	N - This greenfield site is located to the west of Sawbridgeworth and to the north of West Road. Development would relate well to the existing urban area. However, the site is currently within Green Belt and is therefore considered to be unsuitable at present. The site was identified within the emerging District Plan as a proposed allocation for 100 dwellings.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 125 dwellings The site is considered to be deliverable subject to a review of the Green Belt.	
04/014	Sawbridgeworth Town	0.73	N - This site is located on the eastern side of Sawbridgeworth and forms an integral part of the river landscape in this area. In addition, the site is located within a strategically important parcel of Green Belt that helps prevent the coalescence of Sawbridgeworth with Lower Sheering. The site is therefore considered to be unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
04/015	Sawbridgeworth Town	2.99	N - This site is located on the eastern side of Sawbridgeworth and forms an integral part of the river landscape in this area. In addition, the site is located within a strategically important parcel of Green Belt that helps prevent the coalescence of Sawbridgeworth with Lower Sheering. The site is therefore considered to be unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
04/017	Sawbridgeworth Town	11.21	N - This is a brownfield site located on the edge of Spellbrook. The site is considered to be unsuitable as it is located within the Green Belt, on the edge of a Group 2 villlage. However the site could not be considered to be infill development and so would remain unsuitable under the draft Plan.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
04/018	Sawbridgeworth Town	27.9	Y - The site consists of a nursery and orchard, much of which is designated as a county wildlife site. The site is suitable for community uses which would preserve and enhance this asset.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	Deliverable for community use			

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
04/055	Sawbridgeworth Town	3.86	N - This greenfield site is located to the south of Sawbridgeworth. It forms part of a wider strategic section of Green Belt that prevents coalescence of the town with Harlow and High Wych. Although in itself development of the site would not reduce the gap between the two settlements, further urbanisation and reduction in openness of this strategically important area of Green Belt land should be resisted.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
04/056	Sawbridgeworth Town	2.53	N - This greenfield site is located to the north of Sawbridgeworth. As it is adjacent to the settlement boundary, it is well related to the existing urban area. However the site is within the Green Belt and is therefore currently considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 76 dwellings The site is considered deliverable subject to a review of the Green Belt	
04/060	Sawbridgeworth Town	0.27	N - This site is located on the edge of Spellbrook. It is considered to be unsuitable as it is located within the Green Belt, on the edge of a Group 2 village and could not be considered to be infill development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
04/061	Sawbridgeworth Town	0.42	N - This greenfield site is located within Spellbrook. Development in this location is likely to be considered infill and is therefore appropriate for limited development	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	Up to 5 dwellings The site is considered deliverable			
04/062	Sawbridgeworth Town	5.75	N - This site is located on the eastern side of Sawbridgeworth and forms an integral part of the river landscape in this area. In addition, the site is located within a strategically important parcel of Green Belt that helps prevent the coalescence of Sawbridgeworth with Lower Sheering. The site is therefore considered to be unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
05/001	Ware Town	11.23	N - This greenfield site is located to the south of Ware. The site forms part of a wider strategic section of Green Belt that prevents coalescence of the town with Hertford and Great Amwell. Further urbanisation and reduction in openness of this strategically important area of Green Belt land should be resisted. As such, the site is considered to be unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
05/002	Ware Town	1.8	Site not assessed as permission has been granted and development is complete.						
05/003	Ware Town	10.65	N - This greenfield site is located to the north west of Ware. While the site is within the route of the A10, and is well related to the existing settlement, it forms part of Poles Park which is designated as a historic park or garden. The site is also currently located within the Green Belt. As such, the site is considered to be unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
05/004	Ware Town	5.2	N - This greenfield site is located to the north of Ware. The site is well related to the existing urban area and could be appropriate for development, either in isolation or as part of a larger strategic site. However, at present the site is considered to be unsuitable due to its location within the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - The site is considered to be achievable at present. However, in order to deliver a strategic scale of development, major infrastructure would be required. Further work would therefore be required to assess achievability.				The site could form part of a larger strategic scale development in this location subject to a review of the Green Belt.
05/005	Ware Town	1.12	N - This greenfield site is currently in use as allotments associated with Presdales School. The site is relatively well related to the existing urban area, however it is considered to be unsuitable for development due to its location in the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 34 dwellings The site is considered to be deliverable subject to a review of the Green Belt	
05/007	Ware Town	0.23	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
05/008	Ware Town	2.27	N - This greenfield site is located to the south of Ware. The site forms part of a wider strategic section of Green Belt that prevents coalescence of the town with Hertford. Further urbanisation and reduction in openness of this strategically important area of Green Belt land should be resisted. As such, the site is considered to be unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
05/009	Ware Town	1.8	Site not assessed as permission has been granted and development is complete.						
05/010	Ware Town	0.1	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
05/011	Ware Town	0.1	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
05/013	Ware Town	14.61	N - This greenfield site is located to the south of Ware. The site forms part of a wider strategic section of Green Belt that prevents coalescence of the town with Hertford. Further urbanisation and reduction in openness of this strategically important area of Green Belt land should be resisted. As such, the site is considered to be unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
05/014	Ware Town	1.66	N - This greenfield site is located within the Crane Mead area of Ware. While the site is well related to existing development, a number of concerns lead to the site being considered unsuitable. The site forms part of a wider strategic section of Green Belt that prevents coalescence of the town with Great Amwell. Although in itself development of the site would not reduce the gap between the two settlements, further urbanisation and reduction in openness of this strategically important area of Green Belt land should be resisted. Furthermore, a large part of the site lies within Flood Zone 3. In addition, development may impact negatively on the adjacent Lee Valley Regional Park.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
05/015	Ware Town	0.4	Site not assessed as permission has been granted and the principle of development is therefore accepted.						

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
05/016	Ware Town	4.27	N - This partly greenfield site is located to the south of Ware. The site forms part of a wider strategic section of Green Belt that prevents coalescence of the town with Hertford. Further urbanisation and reduction in openness of this strategically important area of Green Belt land should be resisted. As such, the site is considered to be unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
05/017	Ware Town	2.16	N - This partly greenfield site is located to the south of Ware. The site forms part of a wider strategic section of Green Belt that prevents coalescence of the town with Hertford. Further urbanisation and reduction in openness of this strategically important area of Green Belt land should be resisted. As such, the site is considered to be unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
05/018	Ware Town	2.1	Site not assessed as permission has been granted and development is complete.						
05/019	Ware Town	3.85	N - This partly greenfield site is located to the south of Ware. The site forms part of a wider strategic section of Green Belt that prevents coalescence of the town with Hertford. Further urbanisation and reduction in openness of this strategically important area of Green Belt land should be resisted. As such, the site is considered to be unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
05/020	Ware Town	11.75	This site has been assessed as part of site 44/005.						
05/021	Ware Town	0.1	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
05/022	Ware Town	0.82	Site not assessed as permission has been granted and the principle of development is therefore accepted.						
05/090	Ware Town	0.72	N - This greenfield site is located to the west of Ware. While the site is within the route of the A10, and is well related to existing development, it is within the Green Belt and much of the site is subject to a Tree Preservation Order. As such the site is considered to be unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
05/096	Ware Town	1.2	N - This greenfield site is located off Viaduct Road. While it is well related to existing development, the site lies within the Green Belt. In addition, the green space plays an important role in maintaining the semi-rural character of this part of Ware. As such it is considered to be unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
06/001	Albury	6.25	N - This greenfield site is located within the Rural Area Beyond the Green Belt. The site is open land, unrelated to a settlement. Development in this location would be an unacceptable intrusion into open countryside, and as such is considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
06/002	Albury	0.96	N - This greenfield site is located within the Rural Area Beyond the Green Belt. It is unrelated to a settlement and development in this location would be an unacceptable intrusion into open countryside. As such it is considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
07/001	Anstey	0.52	N - This greenfield site is located within the Rural Area Beyond the Green Belt on the edge of a Group 3 village. Any development in this location would represent an unacceptable encroachment into the countryside, and as such is considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
07/002	Anstey	2.7	N – This brownfield site is identified as an Employment Area which is located in the Rural Area Beyond the Green Belt. The site promoters consider that the site is no longer suitable or viable for ongoing employment use. The site is however entirely separate from any existing settlement and as such is considered to be an unsustainable location for residential development.	N - While the site has been promoted through the Call for Sites on behalf of the landowner, it is currently designated as an Employment Area and is therefore not considered to be currently available.	Y – Site is considered achievable.	No	No	No	No
08/001	Ardeley	0.19	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
09/001	Aspenden	2.8	N - This greenfield site is located to west of Buntingford, immediately north of an allocated employment area. It is considered that the site would be deliverable for employment use subject to an extension of the existing employment area. This is proposed as part of the emerging District Plan.	Y - The site has been promoted through the Call for Sites by the landowner and is considered available.	Y – Site is considered achievable.			The site is considered deliverable for employment uses subject to a review of the Green Belt.	
10/001	Aston	0.44	Y – This former orchard is located in the Green Belt on the edge of Aston, a Group 2 village. The site is surrounded by development on three sides and is therefore likely to be considered appropriate for limited infill development.	Y - The Call for Sites form has been submitted on behalf of six landowners. It is therefore considered that the site is available.	Y – Site is considered achievable.	Up to 10 dwellings The site is considered deliverable			
10/002	Aston	3.04	N – This large greenfield site is located in the Green Belt to the north of Aston. Development would not represent infill development in a Group 2 village and could not come forward through a Neighbourhood Plan due to its location in the Green Belt, and as such is considered unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered available.	Y – Site is considered achievable.	No	No	No	No
10/003	Aston	0.48	N – This greenfield site is located in the Green Belt to the west of Aston. Development would not represent infill development in a Group 2 village and could not come forward through a Neighbourhood Plan due to its location in the Green Belt, and as such is considered unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered available.	Y – Site is considered achievable.	No	No	No	No
10/004	Aston	0.29	N – This greenfield site is located in the Green Belt to the west of Aston. Development would not represent infill development in a Group 2 village and could not come forward through a Neighbourhood Plan due to its location in the Green Belt, and as such is considered unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered available.	Y – Site is considered achievable.	No	No	No	No
10/006	Aston	9.7	N – This greenfield site is poorly related to either Stevenage or Aston End and lies within the Green Belt. It is therefore unsuitable at present when considered in isolation. However, the site does relate well to other SLAA sites further north, and there may be potential for strategic scale development, including necessary services and facilities, which would relate well to Stevenage.	Y - The site has been promoted through the Call for Sites by the landowner and is considered available.	Y - The site is considered to be achievable at present. However, in order to deliver a strategic scale of development, major infrastructure would be required. Further work would therefore be required to assess achievability.				The site could form part of a larger strategic scale development in this location subject to a review of the Green Belt.

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
10/007	Aston	1.3	N - This greenfield site is located in the Green Belt adjacent to Gresley Way and the built up area of Stevenage. The site would have to be accessed from Gresley Way. However, at present there is landscaped banking and mature tree growth which screens views of the urban area of Stevenage from open countryside. On this basis the site is considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered available.	Y – Site is considered achievable.	No	No	No	No
11/001	Bayford	0.18	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
11/003	Bayford	0.28	Y– This site is located within the Green Belt and is currently in authorised Gypsy and Traveller use. The site is in a rural location which is remote from local services and is therefore considered to be an unsustainable location for future general needs housing. However it is suitable for an expansion for Gypsy and Travellers.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	The site is considered deliverable for Gypsy and Traveller use	No	No	No
12/001	Bengeo Rural	22.12	N – This large greenfield site is located within the Green Belt. Any development would be an incursion into open countryside and, as such, is considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
12/002	Bengeo Rural	0.41	N - This greenfield site is located within the Rural Area Beyond the Green Belt to the south west of Tonwell, a Group 2 village. While the site would not constitute infill development, it could come forward if identified through a Neighbourhood Plan.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 10 dwellings The site is considered deliverable subject to a review of the settlement boundary through a Neighbourhood Plan	
12/003	Bengeo Rural	0.32	N – This large greenfield site is located within the Green Belt. Any development would be an incursion into open countryside and, as such, is considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
13/001	Benington	1.74	N – This greenfield site lies within the Rural Area Beyond the Green Belt, in a Group 2 village. Whilst reasonably well related to the existing built up area of Benington, this is a relatively large site and its development would be out of scale with the form and character of the village. However, development of part of the site could be suitable if identified through a Neighbourhood Plan for Benington.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 10 dwellings The site is considered deliverable subject to a review of the settlement boundary through a Neighbourhood Plan for Benington.	
13/002	Benington	0.31	N – This greenfield site lies within the Rural Area Beyond the Green Belt, to the west of Hebing End. Development on the edge of this Group 3 settlement would result in an unacceptable incursion into the countryside. As such, the site is considered unsuitable.	Y - Site has been promoted through the Call for Sites process. Site is in multiple land ownership within same family with intentions known. Site is considered available for development.	Y – Site is considered achievable.	No	No	No	No
13/003	Benington	0.34	N - This greenfield site is located within the Rural Area Beyond the Green Belt, to the south of Town Lane, Benington. Although the site would not represent infill development in a Group 2 village, the site could be brought forward if identified within a Neighbourhood Plan.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	Up to 9 dwellings The site is considered deliverable subject to a review of the settlement boundary through a Neighbourhood Plan for Benington.	No
13/004	Benington	0.36	N – This greenfield site lies within the Rural Area Beyond the Green Belt, to the west of Hebing End. Development on the edge of this Group 3 settlement would result in an unacceptable incursion into the countryside. As such, the site is considered unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
13/005	Benington	0.14	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
13/006	Benington	0.84	N – This greenfield site lies within the Rural Area Beyond the Green Belt, to the west of Hebing End. Development on the edge of this Group 3 settlement would result in an unacceptable incursion into the countryside. As such, the site is considered unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
13/008	Benington	0.34	N – This brownfield site lies within the Rural Area Beyond the Green Belt. Previously in use as a chalk pit and pumping station, the site is located within the Benington Conservation Area. This site is heavily covered by mature tree coverage and topographically constrained due to the height difference of the site and the road. Development on this site is not considered to relate well to the built up area and is therefore considered unsuitable for development.	Y - Site is in multiple ownership. However it has been promoted for development by the landowner through the Call for Sites and is therefore considered available for development.	Y – Site is considered achievable.	No	No	No	No
13/009	Benington	0.17	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
13/010	Benington	0.74	N - Site is predominantly a greenfield site containing disused sheds along the north-west boundary of the site. Site is located within the Green Belt in a rural setting with limited access to local services. Site is not considered to be located in a sustainable location and is therefore considered unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
13/011	Benington	0.17	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
13/012	Benington	0.22	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
13/013	Benington	0.77	N - This greenfield site is located within the Rural Area Beyond the Green Belt, to the south of Town Lane, Benington. Although the site would not represent infill development in a Group 2 village, the site could be brought forward if identified within a Neighbourhood Plan.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 10 dwellings The site is considered deliverable subject to a review of the settlement boundary through a Neighbourhood Plan for Benington.	
13/018	Benington	1.25	N - This greenfield site is located within the Rural Area Beyond the Green Belt, to the west of Walkern Road, Benington. Although the site would not represent infill development in a Group 2 village, the site could be brought forward if identified within a Neighbourhood Plan.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 10 dwellings The site is considered deliverable subject to a review of the settlement boundary through a Neighbourhood Plan for Benington.	
15/001	Braughing	1.71	N – This greenfield site lies within the Rural Area Beyond the Green Belt, adjacent to existing development on Pelham Road and opposite the existing housing on Friars Road. The site is relatively large although it does have a reasonable relationship with the existing built up area of Braughing. Potential access can be achieved from Pelham Road. The site has surface water flooding issues towards its northern boundary. Development of part of the site may be considered appropriate with careful layout in keeping with the surrounding area without having an adverse impact visually. However the site is currently outside of the village boundary and is therefore currently unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 30 dwellings The site is considered deliverable subject to an amendment to the village boundary through a Neighbourhood Plan for Braughing.	

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
15/002	Braughing	0.83	N – This greenfield site lies within the Rural Area Beyond the Green Belt, between Braughing and Hay Street. Development in this location would represent an unacceptable extension of ribbon development in a rural setting. Remote from Braughing and its local services the site is considered to be an unsustainable location for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
15/003	Braughing	1.61	N - This greenfield site lies within the Rural Area Beyond the Green Belt. Development of the site would be out of scale with the character of the existing village. Although the site lies adjacent to the village boundary, it cannot be described as being within the built up area of the village. The site is part of the open countryside, traversed by public footpaths, and separates the village from the isolated ribbon development to the north. To connect the two would involve an unacceptable incursion into countryside, which forms an important setting for the village. An outline application for 60 houses (3/14/1448/OP) was refused, a public inquiry has taken place and the appeal has been dismissed.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
15/004	Braughing	6.7	N - This large greenfield site lies within the Rural Area Beyond the Green Belt. Development of the site would be out of scale with the character of the existing village. Although the site lies adjacent to the village boundary, it cannot be described as being within the built up area of the village. The site is part of the open countryside, traversed by public footpaths, and separates the village from the isolated ribbon development to the north. To connect the two would involve an unacceptable incursion into countryside, which forms an important setting for the village. An outline application for 60 houses (3/14/1448/OP) was refused, a public inquiry has taken place and the appeal has been dismissed.	Y - Site has been promoted through the call for sites process. Planning application indicates the site owners intentions. Site is therefore considered available.	Y – Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
15/005	Braughing	0.73	N – The site is contained and is relatively well related to the existing settlement. It could be suitable for development but at present is located within the Rural Area Beyond the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 18 dwellings The site is considered deliverable subject to an amendment to the village boundary through a Neighbourhood Plan for Braughing.	
15/007	Braughing	0.33	N – This site is located on the western side of Braughing, adjacent to the settlement boundary. The site is well related to the existing settlement. However, at present is located within the Rural Area Beyond the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 8 dwellings The site is considered deliverable subject to an amendment to the village boundary through a Neighbourhood Plan for Braughing.	
15/016	Braughing	36	N – This very large greenfield site is located within the Rural Area Beyond the Green Belt to the north of Braughing. Development of the site would be totally out of scale with the existing village and contrary to the Council's policy to allow some limited development in sustainable villages. The site is part of the open countryside, traversed by public footpaths, and separates Braughing from the hamlet of Hay Street to north. To connect the two would involve an unacceptable incursion into open countryside, which forms an important setting for the village. The site is not considered suitable for future housing development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
15/019	Braughing	2.49	N – This greenfield site is located within the Rural Area Beyond the Green Belt to the north of Braughing. The site falls within SLAA site ref 15/016. The site is part of the open countryside and is isolated from both Braughing to the south and Hay Street to the north. The site is in a rural location which is remote from local services and is therefore considered to be an unsustainable location for future housing development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
15/020	Braughing	6.1	N- This large green field site is located to the north of Puckeridge in the Rural Area Beyond the Green Belt, an Area of Archaeological Significance and within a Scheduled Monument. The site is located away from the built up area of the village, in open countryside. The site does not have direct access. Constrained by both its unsustainable location and topography the site is considered unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
16/001	Brent Pelham	0.31	N - Located on Pump Hill, the site is surrounded by low density residential development. There is currently no direct access to the site. Access may be constrained by TPO's along the eastern boundary. The site is well related to existing development and is likely to be considered infill. However at present the site is unsuitable as it is located within the Rural Area Beyond the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 5 dwellings The site is considered deliverable subject to being identified within a Neighbourhood Plan for Brent Pelham.	
17/001	Brickendon Liberty	1.09	Site not assessed as permission has been granted and development is complete.						
17/002	Brickendon Liberty	24.89	N - This is a large greenfield site located within the Green Belt, to the south of Hertford. It is located between the railway line and Brickendon Lane. There is potential for development to have a negative impact on Brickendonbury. Development would represent an unacceptable incursion into open countryside, impacting on the openness of the Green Belt in this location. As such the site is considered unsuitable for future housing development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
17/003	Brickendon Liberty	0.17	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
18/001	Buckland	0.155	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
19/001	Cottered	2.18	N – This is an isolated site located within the Rural Area Beyond the Green Belt. Surrounded by open fields and a handful of farm house residences, the site is accessed via a narrow road. There is a history of refused and withdrawn planning applications on the site including for an agricultural barn to house a herd of Alpacas. The southern edge of the site lies in Flood Zone 3. Given that the site is in a rural location which is remote from local services it is therefore considered to be an unsustainable location for future housing development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
19/002	Cottered	12.94	N – This large greenfield site is located within the Rural Area Beyond the Green Belt. Development of the whole site would be inappropriate. However, the northern part of the site is well related to existing development. Although it would not represent infill development in a Group 2 village, the site could be brought forward if identified within a Neighbourhood Plan.	Y - The site has been promoted through the Call for Sites by two landowners and is considered to be available.	Y – Site is considered achievable.	No	No	Up to 10 dwellings The site is considered deliverable subject to a review of the settlement boundary through a Neighbourhood Plan for Cottered.	No
19/003	Cottered	0.45	N – This site lies within the Rural Area Beyond the Green Belt, partly within an Area of Archaeological Significance and within the Cottered Conservation Area. Warren Lane is a narrow road with farm houses on both sides. The site could be considered as infill in a Group 2 village, and as such, is considered to be suitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	Up to 5 dwellings The site is considered deliverable			
19/004	Cottered	0.34	Site not assessed as permission has been granted and development is complete.						

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
19/005	Cottered	2.092	N – This greenfield site is located within the Rural Area Beyond the Green Belt. Development of the whole site would be inappropriate. However, part of the site is well related to existing development. Although it would not represent infill development in a Group 2 village, the site could be brought forward if identified within a Neighbourhood Plan.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.			Up to 10 dwellings The site is considered deliverable subject to a review of the settlement boundary through a Neighbourhood Plan for Cottered.	
20/001	Datchworth	0.48	N - While it is well related to existing development, Bulls Green is a Group 3 village in the Green Belt which is an unsustainable location for future housing development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
20/002	Datchworth	0.78	N - Site is a previously developed site but is currently in commercial use. The site is also within the Green Belt and is detached from the main built up area of Datchworth. It is therefore in an unsustainable location for future housing development.	N - Site is currently in employment use and is not considered to be available at present. However the site has been promoted by the landowners through the Call for Sites process.	Y – Site is considered achievable.	No	No	No	No
20/003	Datchworth	1.32	N - Site is within the Green Belt. While it is well related to existing development, Burnham Green is a Group 3 village which is an unsustainable location for future housing development.	N - The southern part of the site is currently in use as a site for mobile homes and so is not considered to be currently available.	Y - Site is considered achievable.	No	No	No	No
20/009	Datchworth	20	N – This large greenfield site is located in the Green Belt adjacent to the main built up area of Datchworth. Development would not represent infill development in a Group 2 village and could not come forward through a Neighbourhood Plan due to its location in the Green Belt, and as such is considered unsuitable.	N - The site was not submitted through the Call for Sites and it is therefore not known whether the site is available.	Y – Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
20/010	Datchworth	4.12	N – This large greenfield site is located in the Green Belt adjacent to the main built up area of Datchworth, a Group 2 village. Although the site is adjacent to the main built up area of the village the scale of development proposed would be inappropriate, representing an unacceptable intrusion into the openness of the Green Belt. This site is therefore considered unsuitable for development. A smaller scale of development maybe more acceptable in Green Belt terms, however it would not constitute infill development in a Group 2 village and could not come forward through a Neighbourhood Plan due to its location in the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
20/011	Datchworth	2.5	N - Site is within the Green Belt. Development would involve the consolidation of existing ribbon development away from the main part of the village. Previous applications for residential development in this location have been refused. Burnham Green is a Group 3 village in the Green Belt which is an unsustainable location for future housing development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
20/012	Datchworth	4.75	N – This large greenfield site is located in the Green Belt. It is poorly related to the main built up area of the village and the scale of development proposed would be inappropriate, representing an unacceptable intrusion into the openness of the Green Belt. Development would not represent infill development in a Group 2 village and could not come forward through a Neighbourhood Plan due to its location in the Green Belt, and as such is considered unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
21/001	Eastwick & Gilston	2.29	N – The site is located within the Green Belt and is currently used as stables. There are existing residential dwellings to the south-eastern part of the site, while there is an upward slope on its northern part. Although the site has direct access and lies close to existing development, Gilston is a Group 3 village and is therefore considered to be an unsustainable location for further non-strategic development. There is however potential for the site to form part of a much larger strategic site to the north of Harlow.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - It is considered that the site is achievable. However, it is likely that significant infrastructure would be required which would impact on viability.				The site is unsuitable when considered in isolation. However, it could form part of a much larger strategic scale development to the north of Harlow subject to a review of the Green Belt
21/002	Eastwick & Gilston	136.29	N - There are a number of constraints on site including Areas of Archeological Significance and Wildlife Sites. It is likely however that, given the size of the site, impacts on these areas could be mitigated through careful design. The south western part of the site lies within Flood Zones 2 and 3 which would constrain the developable area. The site could provide strategic scale development, either in isolation or as part of a wider scheme involving neighbouring sites. However, the site is within the Green Belt and is therefore currently unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - It is considered that the site is achievable. However, it is likely that significant infrastructure would be required which would impact on viability.				The site could provide strategic scale development, either in isolation or as part of a wider scheme, to the north of Harlow subject to a review of the Green Belt
21/004	Eastwick & Gilston	1015.41	N - There are a number of constraints on site including Areas of Archeological Significance and Wildlife sites. It is likely however that, given the size of the site, impacts on these areas could be mitigated through careful design. The southern part of the site lies within Flood Zones 2 and 3 which would constrain the developable area. The site could provide strategic scale development, either in isolation or as part of a wider scheme involving neighbouring sites. However, the site is within the Green Belt and is therefore currently unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - It is considered that the site is achievable. Development in this location has been assessed through the Delivery Study and is considered to be viable.				The site could provide strategic scale development, either in isolation or as part of a wider scheme, to the north of Harlow, subject to a review of the Green Belt
21/005	Eastwick & Gilston	0.81	N - This Green Belt site is designated as an Area of Archaeological Significance. Whilst located adjacent to Terlings Park, the site is separated from SLAA sites to the north by the A414 and appears isolated and unrelated to existing development and facilities. The site is therefore considered to be an unsuitable location for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
21/006	Eastwick and Gilston	8.02	N - This Green Belt site is designated as an Area of Archaeological Significance. Gilston Park House is also a Grade 2* listed building and any development in this location would have a significant impact on its setting. The site is therefore considered to be an unsuitable location for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
21/009	Eastwick & Gilston	113.35	The site is largely within Flood Zones 2 and 3 which would constrain the developable area and result in isolated development. The site could provide strategic scale development, either in isolation or as part of a wider scheme involving neighbouring sites. However, the site is within the Green Belt and is therefore unsuitable	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - It is considered that the site is achievable. However, it is likely that significant infrastructure would be required which would impact on viability.				The site is unsuitable when considered in isolation. However, it could form part of a much larger strategic scale development to the north of Harlow subject to a review of the Green Belt
22/001	Furneux Pelham	0.31	Y – This greenfield site is located in the Rural Area Beyond the Green Belt, within Furneux Pelham, a Group 2 village. Although well related to the existing built up area, there is no direct access to the site. The site is covered by mature trees and development would impact negatively on the character of the village.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - It is considered that the site is achievable.	No	No	No	No
22/002	Furneux Pelham	0.26	N - Site is a greenfield site, located within the Rural Area Beyond the Green Belt, to the east of Furneux Pelham. Located adjacent to a Grade II listed building, the site is bounded by heavy foliage without direct access into it. The site is divorced from the main settlement and local services and facilities and is therefore considered to be an unsustainable location for future housing development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - It is considered that the site is achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
22/003	Furneux Pelham	0.37	N – This greenfield site is located within the Rural Area Beyond the Green Belt, to the south of Barleycroft End, Furneux Pelham. The site is located adjacent to the settlement boundary. As such limited development in this location could come forward if the site is identified in a Neighbourhood Plan	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - It is considered that the site is achievable.			Up to 9 dwellings The site is deliverable subject to a review of the settlement boundary through a Neighbourhood Plan for Furneux Pelham.	
22/004	Furneux Pelham	0.25	N – This brownfield site is located within the Rural Area Beyond the Green Belt, an Area of Archaeological Significance and the Furneux Pelham Conservation Area. The site partially serves as an access to adjacent buildings and to a storage and employment site on the southern part of the site. The site is located outside of the main built up area. Whilst there is scope for infill development in Group 2 villages, the site forms part of a wider gap which is important to the setting of the village. Planning permission for the demolition of a Dutch barn and erection of 3 dwellings has previously been refused (ref. 3/10/1838/FP). As such the site is considered unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - It is considered that the site is achievable.	No	No	No	No
23/001	Great Amwell	0.65	This site has not been assessed as it has been confirmed as no longer being available.						
23/002	Great Amwell	2.05	N – This brownfield site is located within the Green Belt in Great Amwell, a Group 2 Village. The site is currently in use as a nursery with storage units. The site is fairly well screened by mature hedgerows to the south and east of the site. Development of a site of this size would be out of scale and character with the area and would impact on the openness of the Green Belt in this strategic gap. As such the site is considered unsuitable for housing development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - It is considered that the site is achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
23/003	Great Amwell	0.23	Y – This partially greenfield site is located in the Green Belt, within the built up area of Stanstead Abbots. The northern part of the site is within a Local Wildlife Site. There is an existing depot located on the site; the SLAA site boundary excludes the pumping station. The site is also located adjacent to a railway line where a buffer may be required. The site is potentially considered suitable for infill development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - It is considered that the site is achievable.	Up to 5 dwellings The site is considered deliverable			
23/004	Great Amwell	39.49	N – This large greenfield site is located within the Green Belt, to the west of Great Amwell and east of the A10. The site lies in the strategic gap between the southern edge of Ware and the north side of Hoddesdon (2.4 km apart). Large scale development in this location would represent a clear incursion into open countryside, impacting on the openness of the Green Belt in this sensitive location and as such the site is considered unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y – Site is considered achievable.	No	No	No	No
23/021	Great Amwell	22.2	N - This greenfield site is located to the east of the A1170 with access from Hillside Lane. The site is located within the Green Belt and forms part of the strategic gap between Great Amwell and Stanstead Abbots. As such the site is considered unsuitable for residential development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
23/022	Great Amwell	3.69	N – This part brownfield/greenfield site is located within the Green Belt in Great Amwell, a Group 2 Village. Development of a site of this size would be out of scale and character with the area and would impact on the openness of the Green Belt in this strategic gap. As such the site is considered unsuitable for housing development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
25/001	Hertford Heath	5.46	N – This large greenfield site is located within the Green Belt and its development would be totally out scale with the village. It would also involve an unacceptable intrusion into open countryside on the opposite side of the main road to the village. It would be an isolated development and an intrusion into land, which forms part of a swathe of agricultural land and is part of the open setting of the village. There are TPOs on northern and eastern boundaries of site.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
25/002	Hertford Heath	70.38	N – This strategic greenfield site is located in the Green Belt to the north of the main built up area of Hertford Heath, a Group 1 village. Developing a large neighbourhood/settlement in this location would be totally out of scale with the village and an unacceptable intrusion into the openness of the Green Belt. However, the southern part of the site could be considered suitable subject to a review of the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.			Up to 40 dwellings The site is considered deliverable subject to a review of the Green Belt through a Neighbourhood Plan for Hertford Heath.	
25/003	Hertford Heath	1.7	N – This part greenfield/brownfield site is located in the Green Belt outside of the village boundary. Whilst the site has some existing dwellings on it, further intensification would impact on the openness of the Green Belt in this location. As such the site is considered unsuitable for further residential development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
26/001	Hertingfordbury	128.5	N - This is a very large site in the Green Belt. The site promoter has suggested that it could be appropriate for a number of uses. However, there are a large number of constraints on the site. Part of it remains in use as a quarry, and the workings and curtilage take up a considerable amount of land. Part of the site is also constrained by Flood Zones 2 and 3 and the promoter advises that there are lagoons on site. Further constraints include a Scheduled Ancient Monument, Tree Preservation Orders and Local Wildlife Sites. Given it's isolated location, it is considered that any development would represent an unacceptable incursion into open countryside.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
26/003	Hertingfordbury	71.11	N – This large greenfield site is located in the Green Belt to the east of Welwyn Garden City, north of the A414. The majority of the site is identified as an Area of Archaeological Significance and there are a number of features of historic importance in the locality. The area contains known reserves of sand and gravel minerals which would need to be extracted prior to any development. The site is currently unsuitable; however, it offers the opportunity to provide a sustainable urban extension to Welwyn Garden City in conjunction with adjacent land in Welwyn Hatfield Borough, subject to a review of the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - It is considered that the site is achievable. Development in this location has been assessed through the Delivery Study and is considered to be viable.				The site could provide strategic scale development, either in isolation or as part of a wider scheme, to the east of Welwyn Garden City, subject to a review of the Green Belt
26/004	Hertingfordbury	127.21	N – This submission is made up of a number of large greenfield sites within the Green Belt linking Hertingfordbury, Birch Green and Letty Green below the Old Coach Road and another two sites north of the A414. The developer notes that the area could provide small-scale development in keeping with the character of the existing settlements. Development would not represent infill development in a Group 2 village and could not come forward through a Neighbourhood Plan due to its location in the Green Belt, and as such is considered unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
26/005	Hertingfordbury	0.69	N – This brownfield site is located within the Green Belt to the east of Birch Green. The site is currently used for horticulture and storage. Development would not represent infill development in a Group 2 village and could not come forward through a Neighbourhood Plan due to its location in the Green Belt, and as such is considered unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
26/006	Hertingfordbury	3.8	N – This greenfield site is located in the Green Belt to the west of Hertingfordbury, in close proximity to two Grade II Listed Buildings. Poorly related to the existing settlement, development in this location would represent an unacceptable incursion into the countryside impacting on the openness of the Green Belt. Development would not represent infill development in a Group 2 village and could not come forward through a Neighbourhood Plan due to its location in the Green Belt, and as such is considered unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
26/007	Hertingfordbury	1.8	N – This part brownfield/greenfield site is located in the Green Belt to the west of Hertingfordbury, in close proximity to two Grade II Listed Buildings. Poorly related to the existing settlement, development in this location would represent an unacceptable incursion into the countryside impacting on the openness of the Green Belt. Development would not represent infill development in a Group 2 village and could not come forward through a Neighbourhood Plan due to its location in the Green Belt, and as such is considered unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
26/008	Hertingfordbury	0.6	N – This greenfield site is located in the Green Belt to the north of Birch Green. To the east of the site lie two Grade II Listed Buildings. Development would not represent infill development in a Group 2 village and could not come forward through a Neighbourhood Plan due to its location in the Green Belt, and as such is considered unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
26/009	Hertingfordbury	0.57	N – This greenfield site is located in the Green Belt to the north of Birch Green. Development would not represent infill development in a Group 2 village and could not come forward through a Neighbourhood Plan due to its location in the Green Belt, and as such is considered unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
26/010	Hertingfordbury	7	N – This greenfield site is located to the east of Staines Green. Staines Green is a Group 3 Village in the Green Belt and as such the site is considered unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
27/002	High Wych	169.98	N – This large greenfield site is located in the Green Belt around High Wych. There are a number of constraints on site including Areas of Archaeological Significance and Wildlife Sites. It is likely that, given the size of the site, impacts on these areas could be mitigated through careful design. However, this area will form a sensitive strategic gap between High Wych and the Gilston Area development. As such, it is considered unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
27/003	High Wych	6.81	N – This greenfield site lies to the south of High Wych. It forms part of the strategic gap between the village and Sawbridgeworth and as such is considered unsuitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
27/004	High Wych	1.72	N – This greenfield site lies within the Green Belt. The northern part of the site is located in the High Wych Conservation Area and there are Listed Buildings nearby. The site is surrounded by open land apart from a few buildings/structures to the north. Direct access to the site is currently provided from High Wych Lane, through a playground. This is a relatively large site, unrelated to the form and character of the village. Its development would be an incursion into land which forms part of the countryside and the visual setting for the village. As such is not considered suitable for development.	N - The ownership of the site is not known. Site not considered to be available now.	Y - Site is considered achievable.	No	No	No	No
27/008	High Wych	0.7	N - This greenfield site is located within the Rural Area Beyond the Green Belt. Although relatively well related to existing development, Allen's Green is a Group 3 village and is therefore considered to be an unsustainable location for future housing development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
28/001	Hormead	0.9	Y - Site is located within the Rural Area Beyond the Green Belt and in Flood Zone 3. Site is proposed for leisure/recreational use. Planning permission (3/09/0352/FP) previously granted for a football pitch and car parking. Site is therefore considered suitable for leisure/recreational use.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available. Planning permission (3/09/0352/FP) previously granted for a football pitch and car parking.	Y - Site is considered achievable for leisure/recreation use.	Site is considered deliverable for Leisure/Recreation use			

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
28/002	Horstead	3.63	N – This predominantly greenfield site is located within Rural Area Beyond the Green Belt. This is a relatively large site and its development would be out of scale with the existing village. Whilst development would link the school and the main built up area of the village this would be an unacceptable intrusion into the countryside setting of the village. Great Horstead is also a Group 3 village which is an unsustainable location for future housing development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
28/003	Horstead	0.89	N - This partially brownfield site is located within the Rural Area Beyond the Green Belt, adjacent to the Great Horstead Conservation Area. The northern part of the site is open land and a brick grain store, which is currently unused, is located on the southern boundary of the site. Site slopes gradually to the north. Whilst the site is well located adjacent to the built up area, Great Horstead is a Group 3 village which is an unsustainable location for future housing development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
28/004	Horstead	1.28	N - This greenfield site is located within the Rural Area Beyond the Green Belt. Located to the rear of existing residential development, there is no direct access. There is pedestrian access to the south-east boundary of the site; however, further highways work would be necessary. Whilst the site is located adjacent to the built up area, Great Horstead is a Group 3 village which is an unsustainable location for future housing development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
28/005	Horstead	1.03	N – This isolated brownfield site is located within the Rural Area Beyond Green Belt. The site is currently in B2 and B8 use, although not designated as an Employment Area in the Local Plan. Given that the site is in a rural location which is remote from local services it is considered to be an unsustainable location for future housing development. It is also important to ensure that local employment sites are not lost to housing to ensure a balanced community.	N - Whilst the site has been promoted through the Call for Sites process, site is currently in employment use and is not considered available.	Y - Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
29/001	Hunsdon	28.95	N – This large greenfield site is located to the west of Hunsdon, a Group 1 village. The south western section of the site lies within a County Wildlife Site. While development of the entire site would be completely out of scale with the character of the village, the south eastern section of the site could be suitable for small scale development. However, at present the site is unsuitable due to its location within the Rural Area Beyond the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.			Up to 30 dwellings The site is considered deliverable subject to an amendment to the village boundary through a Neighbourhood Plan for Hunsdon	
29/002	Hunsdon	1.07	N - This greenfield site is located within the Rural Area Beyond the Green Belt to the north of Hunsdon, a Group 1 village. The site is not well related to the existing settlement and development would result in an extension of ribbon development into open countryside. The site is not considered to offer a suitable location for future development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
29/003	Hunsdon	1.14	N - This brownfield site is located in the Rural Area Beyond the Green Belt and is currently in various uses including employment, although not designated as an Employment Area in the Local Plan. While the site lies outside of the identified village boundary, it is well related to the existing settlement and could offer the opportunity to provide small scale development which may enhance the character of the village in this location.	N - While the site has been promoted through the Call for Sites on behalf of the landowner, it is currently in employment use and is therefore not considered to be currently available.	Y - Site is considered achievable.				Up to 29 dwellings The site is considered developable subject to an amendment to the village boundary through a Neighbourhood Plan for Hunsdon and consideration of employment use.

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
29/004	Hunsdon	114.43	N - There are a number of constraints on site including Areas of Archeological Significance and Wildlife sites. It is likely however that, given the size of the site, impacts on these areas could be mitigated through careful design. The site could provide strategic scale development, either in isolation or as part of a wider scheme involving neighbouring sites. However, the site is within the Green Belt and is therefore currently unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - It is considered that the site is achievable. Development in this location has been assessed through the Delivery Study and is considered to be viable.				The site could provide strategic scale development, either in isolation or as part of a wider scheme, to the north of Harlow, subject to a review of the Green Belt
29/005	Hunsdon	0.41	Site not assessed as permission has been granted and the principle of development is therefore accepted.						
29/006	Hunsdon	0.33	Site not assessed as permission has been granted and the principle of development is therefore accepted.						
29/015	Hunsdon	0.36	Site not assessed as permission has been granted and the principle of development is therefore accepted.						
29/017	Hunsdon		N - This brownfield site lies within Rural Area Beyond the Green Belt in the hamlet of Hunsdonbury, a Group 3 settlement. It is therefore considered to be unsuitable for future housing development. There is a planning application on the site awaiting decision on for the demolition of existing dwellings and erection of 14 number of dwellings with garaging and landscaping (3/15/0260/FUL).	N - While the site has been promoted through the Call for Sites on behalf of the landowner, development would result in the loss of a site that was previously in employment use and therefore is not considered to be currently available.	Y - Site is considered achievable.	No	No	No	No
29/018	Hunsdon	0.42	Site not assessed as permission has been granted and the principle of development is therefore accepted.						

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
29/019	Hunsdon	2.81	N – The site lies in the Green Belt, in an isolated location on the edge of Hunsdonbury. The site is a clearing within a woodland. To the east is Bury Plantation which is designated as a Wildlife Site. The site is predominantly open. The site is submitted as part of a 'linked hamlet' concept. However this is not considered a sustainable approach for future housing development and would result in isolated groupings of development with no supporting infrastructure/services. The site is considered unsuitable for future housing development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
29/020	Hunsdon	0.25	Site not assessed as permission has been granted and the principle of development is therefore accepted.						
29/021	Hunsdon	2.02	N - This greenfield site is located on the southern edge of Hunsdon. The northern part of the site is in use as open space. While the remainder of the site is well related to the existing urban area, it is currently considered to be unsuitable as it is located within the Rural Area Beyond the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.			Up to 30 dwellings The site is considered deliverable subject to an amendment to the village boundary through a Neighbourhood Plan for Hunsdon.	
29/022	Hunsdon	4.25	N - This greenfield site is located within Hunsdon Parish, immediately to the west of Briggens Park. While the site is located very close to the A414 it is not well connected to any existing settlement, the closest being Roydon within Epping Forest District. Given its relative isolation and the fact that the site lies within the Green Belt, it is not considered suitable for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
30/001	Little Berkhamsted	5.7	N - The site is located within the Green Belt and is not related to any existing settlement and development would result in an unacceptable incursion into the countryside. The site is therefore in an unsustainable location and is unsuitable for future development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
30/002	Little Berkhamsted	2.9	N - This greenfield site is located within the Green Belt in Little Berkhamsted, a Group 3 village. While the site is reasonably well related to the existing settlement Little Berkhamsted has limited services and facilities and as such is considered to be an unsuitable location for future development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
30/003	Little Berkhamsted	4.29	N - This greenfield site is located within the Green Belt in Little Berkhamsted, a Group 3 village. While the site is reasonably well related to the existing settlement Little Berkhamsted has limited services and facilities and as such is considered to be an unsuitable location for future development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
31/001	Little Hadham	0.66	N - This is a greenfield site located to the south of Stortford Road. The site is covered by an Area of Archaeological Significance designation although it is likely that this could be mitigated. The site is not well related to the existing settlement and development would represent an unacceptable extension to existing ribbon development. This site is within the Rural Area Beyond the Green Belt and is therefore unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
31/002	Little Hadham	269.05	N - This is a very large greenfield site, consisting of a number of open fields around the village of Little Hadham, a Group 2 village. Topographically the site varies, the northern half of the site overlooks Little Hadham and is highly visible from surrounding areas. The River Ash runs through the site, along the eastern half on a north-south axis. Along the line of the river, the site lies within Flood Zone 3 with a risk of Surface Water Flooding although the construction of the Little Hadham bypass and associated flood alleviation measures should largely address this issue. While the site could form part of a larger strategic scale of development in this location in the future, it is currently considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - The site is considered to be achievable at present. However, in order to deliver a strategic scale of development, major infrastructure would be required. Further work would therefore be required to assess achievability.				The site could form part of a larger strategic scale development in this location. The site could be considered to be either deliverable or developable depending on the nature and scale of development.

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
31/003	Little Hadham	3.35	N - This is a brownfield site located in Bury Green. The site currently contains vacant offices and is identified in the Local Plan as a Major Developed Site. Planning permission (3/07/1540/PD) for the demolition of these units was granted in 2007 although this has not been implemented. The site is relatively well related to the existing settlement of Bury Green but, as this is a Group 3 village, the site is considered to be unsuitable for the scale of development envisaged.	N - While the site has been promoted through the Call for Sites on behalf of the landowner, development would result in the loss of an employment site and therefore is not considered to be currently available.	Y - Site is considered achievable.	No	No	No	No
31/004	Little Hadham	0.25	N - This greenfield site is currently used as private garden land for the occupiers to the east of the site. Access is an issue which would need to be overcome. In addition, the site is covered in mature trees which contribute to the character of this part of the village. As such, it is not considered that the site is suitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
31/005	Little Hadham	0.41	N - This is a greenfield site located within the Green Belt to the north east of Bury Green. The site consists of an enclosed field bounded by mature hedgerow with direct access on the northern boundary of the site. A wildlife site covers much of the site. Development in this isolated location would result in an unacceptable incursion into the countryside, impacting on the openness of the Green Belt. The site is therefore considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
31/006	Little Hadham	0.66	Y - This is a greenfield site located to the south of Stortford Road. The site consists of a flat, open field. The site is constrained as it is located within Rural Area Beyond the Green Belt. However, the site is located in close proximity to local services and facilities. The site is regarded as infill development and so is considered to be suitable for limited development in accordance with Group 2 village policy. Further development could be identified within a Neighbourhood Plan	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable,	Up to 5 dwellings Infill development in accordance with Group 2 village policy		Up to an additional 12 dwellings The site is considered deliverable subject to an amendment to the village boundary through a Neighbourhood Plan for Little Hadham.	

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
31/007	Little Hadham	0.18	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
31/024	Little Hadham	5.1	N - This greenfield site is located within the Rural Area Beyond the Green Belt to the south of Stortford Road. The site is not well related to the existing settlement and would represent an unacceptable incursion into the countryside. The site is therefore unsuitable for future development.	N - Land ownership and intentions for the site are unknown.	Y - Site is considered achievable.	No	No	No	No
31/025	Little Hadham	12.18	N - This part greenfield, part brownfield site is located within the Rural Area Beyond the Green Belt. The northern half of the site is in industrial use while the southern half is greenfield, adjacent to the A120. There is direct access to the industrial units via Church End, with no direct access to the southern half of the site. While development of the site in isolation would be unacceptable, it could form part of a larger strategic scale of development in this location in the future.	N - Site has been identified through the Call for Sites process with land ownership and intentions known. However, upper half of site is currently in employment use and is therefore not considered available at the present time	Y - The site is considered to be achievable at present. However, in order to deliver a strategic scale of development, major infrastructure would be required. Further work would therefore be required to assess achievability.				The site could form part of a larger strategic scale development in this location. The site could be considered to be either deliverable or developable depending on the nature and scale of development.
31/026	Little Hadham	1.08	N - This is a brownfield site, located to the south of Hadham Ford within the Rural Area Beyond the Green Belt and within an Area of Archaeological Significance. The site which is a disused pit is poorly related to Hadham Ford. Development would represent an unacceptable incursion into the countryside in this location.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - In order to bring this site forward remediation of the site would be required. However without further information it is considered that the site is achievable.	No	No	No	No
31/027	Little Hadham	2.62	N - This is a greenfield site located within the Rural Area Beyond the Green Belt. Development in this location would lead to a significant reduction in the gap between Little Hadham and Hadham Ford. The southern part of the site, which is closest to existing development, lies within Flood Zone 3b. Development of the remaining part of the site, outside of Flood Zone 3b, would be unsuitable as it would be poorly related to the existing village. It is therefore considered to be unsuitable for future development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
31/028	Little Hadham	0.74	N - This is a greenfield site located to the north of Little Hadham, within the Rural Area Beyond the Green Belt. There are a number of TPO designations along the western boundary of the site. It is relatively well related to the existing built up area of Little Hadham but does not constitute infill development in a Group 2 village and is therefore currently considered to be unsuitable. Development could be brought forward through a Neighbourhood Plan.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.			Up to 19 dwellings The site is considered deliverable subject to an amendment to the village boundary through a Neighbourhood Plan for Little Hadham.	
31/029	Little Hadham	1.83	N - This is a greenfield site located within the Rural Area Beyond the Green Belt. Development in this location would lead to a significant reduction in the gap between Little Hadham and Hadham Ford. The site is therefore considered to be unsuitable for future development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
31/030	Little Hadham	0.2	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
33/001	Much Hadham	0.79	N - This is a greenfield site currently in use as allotment gardens within the Rural Area Beyond the Green Belt. It is located to the west of Much Hadham adjacent to the Group 1 village development boundary and within an Area of Archaeological Significance. There is a proposal to re-locate the allotments to the north of the site although no details are provided. Development of the site may be considered appropriate; however, the site is currently outside of the village boundary. The site is therefore currently unsuitable.	N - The site has been promoted through the Call for Sites by the landowner, however it is currently in use as allotments and details of the proposed relocation are not clear. It is therefore considered that the site is not available at present.	Y - Site is considered achievable.			Up to 20 dwellings The site is considered deliverable subject to an amendment to the village boundary through a Neighbourhood Plan for Much Hadham and relocation of the allotments.	
33/002	Much Hadham	0.23	This site has not been assessed as planning permission has been granted.						

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
33/004	Much Hadham	0.58	N - This greenfield site lies to the south of Much Hadham, within the Conservation Area. While the site is seperated from the main built up area, and consequently the village boundary, the site could be brought forward through a review of the boundary. However, at present the site is unsuitable due to its location within the Rural Area Beyond the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	Up to 15 dwellings The site is considered deliverable subject to an amendment to the village boundary through a Neighbourhood Plan for Much Hadham.	No
33/005	Much Hadham	4.49	N - This is a large greenfield site adjacent to the Conservation Area. Access onto the site is through a narrow road. The site is unsuitable as it is within the Rural Area Beyond the Green Belt, is poorly related to the existing settlement and would lead to an unacceptable incursion of development into an open countryside location.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
33/012	Much Hadham	1.21	N - This site lies to the south of Much Hadham and is adjacent to the Conservation Area. While the site is seperated from the main built up area of the village, and consequently the village boundary, it could be brought forward in conjunction with site 33/004 through a review of the village boundary. However, at present the site is unsuitable due to its location within the Rural Area Beyond the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	Up to 30 dwellings The site is considered deliverable subject to an amendment to the village boundary through a Neighbourhood Plan for Much Hadham.	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
33/013	Much Hadham	1.36	N - This is a greenfield site located to the north-west of Much Hadham within the Rural Area Beyond the Green Belt. Development of the site may be considered appropriate subject to access issues; however, the site is currently outside of the village boundary. The site is therefore currently unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.			Up to 30 dwellings The site is considered deliverable subject to an amendment to the village boundary through a Neighbourhood Plan for Much Hadham.	
33/014	Much Hadham	1.47	N - This is a greenfield site within the Rural Area Beyond Green Belt which lies immediately to the west of site 33/013. While the site is separated from the main built up area of the village, and consequently the village boundary, it could be brought forward in conjunction with site 33/013, subject to access issues, through a review of the village boundary. However, at present the site is unsuitable due to its location within the Rural Area Beyond the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered to be achievable.	No	No	Up to 30 dwellings The site is considered deliverable subject to an amendment to the village boundary through a Neighbourhood Plan for Much Hadham.	No
33/015	Much Hadham	11.17	N - This large greenfield site is located within the Rural Area Beyond the Green Belt to the west of Much Hadham. Although the site is adjacent to the main built up area of the village, achieving a suitable access may be an issue. The scale of development proposed would be inappropriate, representing an unacceptable incursion into the countryside setting of the village. The site is therefore considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered to be achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
33/015a	Much Hadham	0.57	N - This greenfield site forms a small part of site 33/015. The site is well related to the existing built up area of the village, although achieving a suitable access may be an issue. At present the site is considered to be unsuitable due to its location within the Rural Area Beyond the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered to be achievable.			Up to 14 dwellings Site considered deliverable subject to an amendment to the village boundary through a Neighbourhood Plan for Much Hadham.	
33/016	Much Hadham	0.37	N - This is a greenfield site to the south-west of Much Hadham. It is largely covered with woodland although there are no TPO's on the site itself. The site is adjacent to the existing village boundary and access could be achieved from Millers View. Development of the site may be considered appropriate; however, the site is currently outside of the village boundary, within the Rural Area Beyond the Green Belt. The site is therefore currently unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable			Up to 9 dwellings Site considered deliverable subject to an amendment to the village boundary through a Neighbourhood Plan for Much Hadham.	
35/001	Standon	1.74	N - This is a brownfield site currently in employment use. It is located within the Rural Area Beyond the Green Belt, within a Group 3 settlement that has very limited access to local services and facilities. Therefore, while continued employment use on site is considered appropriate, residential redevelopment would be unsuitable.	N - While the site has been promoted through the Call for Sites on behalf of the landowner, development would result in the loss of an employment site and therefore is not considered to be currently available.	Y - Site is considered achievable	No	No	No	No
35/002	Standon	0.48	N - This is a greenfield site, adjacent to the village boundary. While it is well related to the existing settlement, it is considered to be unsuitable as it lies within the Rural Area Beyond the Green Belt and is currently designated as protected open space.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
35/003	Standon	0.47	N - The majority of the site lies outside of the settlement boundary, within the Rural Area Beyond the Green Belt and, as a whole, is therefore considered to be unsuitable. It is, however, well related to the existing settlement. The western part of the site is located within the settlement boundary and is therefore considered to be deliverable. Any proposals would need to give consideration to the proximity of the site to the Conservation Area.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	Up to 2 dwellings On part of site within settlement boundary		Up to 12 dwellings On site as a whole, subject to a review of the village boundary through a Neighbourhood Plan for Standon.	
35/004	Standon	11.24	N - This is a large greenfield site, located immediately north of the A120, and reasonably well related to the existing settlement. While development of the entire site would be contrary to Group 1 village policy, it could enable the delivery of 10% growth within the village as envisaged by the draft District Plan. However, at present the site is considered to be unsuitable as it is located within the Rural Area Beyond the Green Belt. The site is currently subject to Planning Application 3/15/2081/OUT for up to 205 dwellings.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.			Up to 146 dwellings Subject to a review of the village boundary through a Neighbourhood Plan for Standon.	
35/005	Standon	2.93	N - This is a greenfield site located in Colliers End. The site is considered to be unsuitable as it is located within the Rural Area Beyond the Green Belt. While development on the edge of Group 2 villages can be delivered through Neighbourhood Plans, development of this site would lead to an unacceptable incursion into the countryside.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
35/007	Standon	5.79	N - This site is located to the north of Colliers End. The site is detached from the settlement and development would result in an unacceptable incursion into the countryside. As such it is considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable. The demolition of existing units and remediation of the site would be required.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
35/008	Standon	0.5	N - This is a greenfield site located in Colliers End, a Group 2 village. While located within the Rural Area Beyond the Green Belt, the site is located adjacent to existing development. Although it would not represent infill development in a Group 2 village, the site could be brought forward if identified within a Neighbourhood Plan.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.			Up to 10 dwellings The site is considered deliverable subject to an amendment to the settlement boundary through a Neighbourhood Plan for Standon.	
35/010	Standon	1.19	Please note that these sites have not been assessed as they are allocated employment sites.						
35/011	Standon	0.93	Please note that these sites have not been assessed as they are allocated employment sites.						
35/012	Standon	0.06	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
35/013	Standon	5.63	N - This is a greenfield site located in Colliers End. It is a large site, the majority of which would be inappropriate due to an unacceptable incursion into the countryside. However the south western parcel of the site is well related to existing development and could be brought forward for small scale development through a Neighbourhood Plan.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.			Up to 10 dwellings The site is considered deliverable subject to an amendment to the settlement boundary through a Neighbourhood Plan for Standon.	

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
35/014	Standon	0.25	N - This is a greenfield site located in Colliers End, a Group 2 village. While located within the Rural Area Beyond the Green Belt, the site is located adjacent to existing development. Although it would not represent infill development in a Group 2 village, the site could be brought forward if identified within a Neighbourhood Plan.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	Up to 6 dwellings The site is considered deliverable subject to an amendment to the settlement boundary through a Neighbourhood Plan for Standon.	No
35/015	Standon	1.84	N - This site is located to the north of Colliers End. The site is detached from the settlement and development would result in an unacceptable incursion into the countryside. As such it is considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
35/016	Standon	8.72	N - The site consists of two distinct fields divided by a mature tree row which runs along the northern axis, both in agricultural use. The western field is partially located within Flood Zone 2 and is also at risk of surface water flooding. This part of the site also contains a Scheduled Ancient Monument and is covered by an Area of Archaeological Significance. Development of the entire site would lead to a scale of development that would be contrary to Group 1 village policy, although a smaller scale of development adjacent to existing development could be appropriate. The site is within the Rural Area Beyond the Green Belt and is therefore unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.			Up to 30 dwellings Subject to a review of the village boundary through a Neighbourhood Plan for Standon	
35/017	Standon	0.9	N - This site is located within the Rural Area Beyond the Green Belt and partly within Flood Zone 2 and 3 with a risk of surface water flooding. In light of the recent appeal decision on land to the east of Cambridge Road, development of the site may be considered appropriate; however, the site is currently outside of the village boundary. The site is therefore currently unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.			Up to 23 dwellings Subject to a review of the village boundary through a Neighbourhood Plan for Standon.	

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
35/018	Standon	0.33	N - This site is located within the Rural Area Beyond the Green Belt. Any development in this location would represent an encroachment into the countryside. Bromley is a Group 3 village with little or no access to services and facilities and is considered to be an unsustainable location for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
35/019	Standon	1.09	N - This is a greenfield site, located within the Rural Area Beyond the Green Belt. Latchford is a Group 3 village with very limited access to services and facilities and is therefore considered to be an unsuitable location for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
35/033	Standon	1.77	N - This site is located within the Rural Area Beyond the Green Belt and partly within Flood Zone 2 and 3 with a risk of surface water flooding. In light of the recent appeal decision on land to the east of Cambridge Road, development of the site may be considered appropriate; however, the site is currently outside of the village boundary. The site is therefore currently unsuitable.	N - The site was promoted through the previous Local Plan process. It is unknown whether the site is still available.	Y - Site is considered achievable.			Up to 30 dwellings Subject to a review of the village boundary through a Neighbourhood Plan for Standon.	
35/034	Standon	1.98	Site not assessed as permission has been granted and the principle of development is therefore accepted.						
35/036	Standon	0.53	N - This is a greenfield site located adjacent to Buntingford Road. The site is considered to be unsuitable as it is located within the Rural Area Beyond the Green Belt and is identified as a Scheduled Monument.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
35/037	Standon	2.47	N - This is a greenfield site located off Stortford Road within the Rural Area Beyond the Green Belt, adjacent to the existing settlement boundary. Development of the site may be considered appropriate; however, the site is currently outside of the village boundary. The site is therefore currently unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.			Up to 30 dwellings Subject to a review of the village boundary through a Neighbourhood Plan for Standon.	

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
35/038	Standon	1.8	N - This greenfield site is located within the Rural Area Beyond the Green Belt to the west of the A10. The site is considered to be unsuitable for development as it is isolated from the existing built up area of Puckeridge due to the presence of the A10. In addition, part of the site is located within Flood Zone 3.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
36/001	Stanstead Abbots	3.38	N - This is a greenfield site located outside of the village boundary. The site is unsuitable as it is within the Green Belt, is not well related to the existing settlement and development would result in an unacceptable incursion into open countryside.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
36/002	Stanstead Abbots	1.32	N - The site is relatively well related to the existing settlement. However it is unsuitable as it is located within the Green Belt and the Lee Valley Regional Park. It is also partly designated as Open Space and lies within Flood Zones 2 and 3.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
36/003	Stanstead Abbots	0.22	Y - This is a greenfield site within the Green Belt and the Lee Valley Regional Park and has been proposed for use as a private marina. The site is considered suitable for the proposed use subject to an assessment of the potential impact on the wildlife site.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	Site is considered deliverable for proposed use.			
36/006	Stanstead Abbots	1.34	Please note that this site has not been assessed as it is in current employment use.						
36/007	Stanstead Abbots	1.35	N - This is a greenfield site located immediately to the south of Stanstead Abbots outside of the village boundary. While the site is well related to the existing settlement it is unsuitable as it is within the Green Belt and the Lee Valley Regional Park.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
36/008	Stanstead Abbots	0.91	N - This is a greenfield site currently in use as a private garden with a tennis court and storage facilities on site. It is unsuitable as it is within the Green Belt, would result in an unacceptable incursion into the countryside and is poorly related to the existing settlement	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
36/016	Stanstead Abbots	0.94	N - This is a part greenfield, part brownfield site with a residential care home, located to the north of the High Street, immediately adjacent to residential development. While the site is relatively well related to the existing settlement, it is unsuitable as it is located in the Green Belt and Lee Valley Regional Park and is also partly within Flood Zones 2 and 3.	N - Site has been identified through the 2007 Local Plan process. It is not known whether the land is still available.	Y - Site is considered achievable.	No	No	No	No
36/017	Stanstead Abbots	1.2	N - This is a brownfield site located to the south of Marsh Lane which is currently in use as a nursery. While the site is relatively well related to the existing settlement, it is unsuitable as it is located in the Green Belt and Lee Valley Regional Park and is also partly within Flood Zones 2 and 3.	N - Site has been identified through the 2007 Local Plan process. It is not known whether the land is still available.	Y - Site is considered achievable. The demolition of existing units would be required to redevelop this site.	No	No	No	No
36/018	Stanstead Abbots	0.34	N - This greenfield site is located on the edge of Stanstead Abbots. The site is considered to be unsuitable as it is located within the Green Belt. However, as a Group 1 village the site could be delivered through a Neighbourhood Plan.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	Up to 9 dwellings The site is considered deliverable subject to a review of the Green Belt through a Neighbourhood Plan for Stanstead Abbots.	No
37/001	Stanstead St Margarets	45.8	N - This is a greenfield site consisting of two large parcels of land separated by the A414 located within the Green Belt. The site forms part of the strategic gap between the settlements of Hoddesdon, Stanstead St Margarets and Great Amwell. As such the site is considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
37/002	Stanstead St Margarets	18.03	N - This is a greenfield site which lies between the A10 and the A1170 within the Green Belt. The site forms part of the strategic gap between the settlements of Hoddesdon, Stanstead St Margarets and Great Amwell. As such the site is considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
37/003	Stanstead St Margarets	0.48	Y - This is a greenfield site, the majority of which is within the settlement boundary and is therefore suitable. A small section of the site is located within Flood Zone 2. The southern section of the site lies on the other side of the A414, within the Green Belt, and is therefore unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	Up to 10 dwellings On part of site within the settlement boundary.			
37/004	Stanstead St Margarets	1.88	N - This is a brownfield site which lies between the A10 and the A1170 within the Green Belt. The site contains derelict buildings relating to its former use as a nursery. The site forms part of the strategic gap between the settlements of Hoddesdon, Stanstead St Margarets and Great Amwell. As such the site is considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable. Demolition and clearing of the existing units would be required and there is a potential need for remediation work.	No	No	No	No
38/001	Stapleford	0.31	N - This isolated site is located within the Green Belt, adjacent to Hubbard's Wood Wildlife Site and within an Area of Archaeological Significance. The site is unsuitable as it is within the Green Belt and in a rural location which is remote from local services. It is therefore considered to be an unsustainable location for future housing development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
38/002	Stapleford	0.43	N - This isolated site is located within the Green Belt, adjacent to Hubbard's Wood Wildlife Site. The site is unsuitable as it is within the Green Belt and in a rural location which is remote from local services. It is therefore considered to be an unsustainable location for future housing development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
40/001	Tewin	1.49	N - This greenfield site is located adjacent to Tewin Cowper Primary School. Part of the site is designated as open space and is currently in use as allotments. The site promoter has suggested that the southern part of the site could be used to re-locate the allotments. However, while the site is reasonably well related to the existing settlement, it is considered to be unsuitable due to its location within the Green Belt. Development in this location would result in an unacceptable intrusion into the rural setting of the village.	Y - The site is in the ownership of a single landowner and has been promoted through the Call for Sites. Part of the site is currently in use as allotments. However the rental agreement with the Parish Council can be terminated with 12 months notice and there is potential to relocate the allotments to the southern part of the site. It is therefore considered that the site is available.	Y - Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
40/002	Tewin	1.97	N - This part greenfield, part brownfield site is poorly related to the existing built up area of Tewin. There are a number of existing structures on the site which are not proposed for demolition which would constrain the developable area of the site. Much of the site, including the entire boundary, is covered by a blanket Tree Preservation Order. The site is unsuitable as it is located within the Green Belt	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
40/003	Tewin	1	N - This greenfield site is located east of Upper Green Road. While it is well related to the existing settlement the site is considered to be unsuitable due to its location within the Green Belt. In order for the site to come forward, the Green Belt would need to be reviewed through the District Plan. The emerging Plan identifies Tewin as a Group 2 village, wherein only limited infill development would be appropriate. This site would not constitute limited infill development.	Y - The site has been promoted through the Call for Sites and is assumed to be available although the site is owned by more than one landowner.	Y - Site is considered achievable.	No	No	No	No
40/004	Tewin	2.23	N - This large greenfield site is located to the north of Tewin. The site is approximately 2 hectares in total although the site promoter has suggested that approximately 0.65 hectares could be suitable for development. While the site is relatively well related to the existing settlement, it is considered to be unsuitable due to its location within the Green Belt. In order for the site to come forward, the Green Belt would need to be reviewed through the District Plan. The emerging Plan identifies Tewin as a Group 2 village, wherein only limited infill development would be appropriate. This site would not constitute limited infill development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
40/007	Tewin	0.91	N - This mainly greenfield site is located to the west of Tewin. While adjacent to the existing village boundary, the site is considered to be unsuitable as it is poorly related to the existing settlement, lies within the Green Belt and any development would represent an unacceptable incursion into the countryside.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
40/008	Tewin	0.31	N - This greenfield site is located east of Upper Green Road. While it is well related to the existing settlement the site is considered to be unsuitable due to its location within the Green Belt. In order for the site to come forward, the Green Belt would need to be reviewed through the District Plan. The emerging Plan identifies Tewin as a Group 2 village, wherein only limited infill development would be appropriate. This site would not constitute limited infill development.	Y - The site has been promoted by the landowner through the Call Sites and is therefore considered to be available.	Y - Site is considered achievable.	No	No	No	No
40/022	Tewin	69.76	N - This is a very large site to the south east of Tewin which is owned by a number of different plot owners. The site is considered to be unsuitable as it is located within the Green Belt and is very poorly related to the existing settlement. Development in this location would result in an unacceptable intrusion into open countryside.	Y - The site has been promoted by a group of over 70 landowners through the Call for Sites and is considered to be available	Y - Site is considered achievable.	No	No	No	No
41/001	Thorley	0.44	N - This greenfield site is located to the east of the railway line within Thorley Parish. The site is considered to be unsuitable as it is poorly related to the existing settlement of Bishop's Stortford and is located within the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
41/002	Thorley	53.14	N - This large greenfield site is located to the south of Bishop's Stortford within the bypass. The site is within an Area of Archaeological Significance and is traversed by the Hertfordshire Way footpath. While the site is well related to the existing settlement, it is currently considered to be unsuitable due to its location within the Green Belt. However it should be noted that the site has been identified within the emerging District Plan as a potential housing allocation.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable. The site is of a strategic scale and would require the provision of supporting infrastructure.			750-1,000 dwellings The site is considered to be deliverable subject to a review of the Green Belt. The final yield would depend on the level of infrastructure to be provided.	
41/003	Thorley	0.48	N- This site is located to the south of Bishop's Stortford to the west of the A1184 at Thorley Wash Farm. The site is considered to be unsuitable as it is poorly related to the existing settlement of Bishop's Stortford and is located within the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
41/005	Thorley	10.91	N - This greenfield site is located to the east of the railway line within Thorley Parish. The site is considered to be unsuitable as it is poorly related to the existing settlement of Bishop's Stortford and is located within the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
41/007	Thorley	0.74	N - This greenfield site is located to the east of Thorley Street. While the site is reasonably well related to existing development, the site is considered to be unsuitable as it is located in the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
41/008	Thorley	0.45	N - This greenfield site is located to the east of Thorley Street. While the site is reasonably well related to existing development, the site is considered to be unsuitable as it is located in the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
42/001	Thundridge	8.5	N - This greenfield site is located to the north west of High Cross, a Group 2 village. The northern part of the site is designated as open space and is used as playing pitches. The considered to be unsuitable as it is located within the Rural Area Beyond the Green Belt, is poorly related to the existing settlement and would represent an unacceptable incursion of built development into open countryside.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
42/002	Thundridge	0.97	N - The site is reasonably well related to the existing village. Development would not represent infill development in a Group 2 village and could not come forward through a Neighbourhood Plan due to its location in the Green Belt, and as such is considered unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
42/003	Thundridge	1.25	N - The site is reasonably well related to the existing village. Development would not represent infill development in a Group 2 village and could not come forward through a Neighbourhood Plan due to its location in the Green Belt, and as such is considered unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
42/004	Thundridge	1.09	N - This greenfield site is located to the east of the school. The site is reasonably well related to the existing urban area. Access is considered to be a significant constraint and although this could be achieved if the site is brought forward alongside site 42/008, this would result in a cumulative total of development that would be inappropriate in a Group 2 village.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
42/005	Thundridge	1.13	N - The site is reasonably well related to the existing village. Development would not represent infill development in a Group 2 village and could not come forward through a Neighbourhood Plan due to its location in the Green Belt, and as such is considered unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
42/006	Thundridge	1.47	Please note that this site has not been assessed as it is in current employment use.						
42/007	Thundridge	0.19	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
42/008	Thundridge	1.15	N - This is a greenfield site that is reasonably well related to the existing settlement of High Cross. Access could be achieved from the north of the site. Although it would not represent infill development in a Group 2 village, the site could be brought forward if identified within a Neighbourhood Plan. However, the site is currently unsuitable due to its location within the Rural Area Beyond the Green Belt	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.			Up to 10 dwellings Subject to a review of the village boundary through a Neighbourhood Plan for Thundridge	
42/009	Thundridge	0.71	Y - This is a greenfield site which now lies outside the settlement boundary. Access to this site is considered to be a major constraint, and as such it is considered that the site is unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
42/010	Thundridge	0.57	N - The site is currently in use as open storage. It is adjacent to the High Cross village boundary and existing employment use. The site is currently unsuitable due to its location within the Rural Area Beyond the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.			The site could be appropriate for employment use subject to a review of the village boundary through a Neighbourhood Plan for Thundridge	
42/011	Thundridge	1.5	N - The site is adjacent to the High Cross village boundary and existing employment use. The site is currently unsuitable due to its location within the Rural Area Beyond the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.			The site could be appropriate for employment use subject to a review of the village boundary through a Neighbourhood Plan for Thundridge.	
42/012	Thundridge	0.26	N - The site is unsuitable as it lies within Rural Area Beyond Green Belt and is isolated from any existing settlement.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
42/013	Thundridge	18.44	N - The site is unsuitable as it lies within Rural Area Beyond Green Belt and is isolated from any existing settlement, and would represent an unacceptable incursion of built development within an open countryside setting.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
42/014	Thundridge	0.86	N - This is a greenfield site located immediately adjacent to the existing village boundary. Following planning permission for the site immediately to the west, it is unlikely that this site could be accessed. It is therefore considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
42/017	Thundridge	0.78	Y - This is a greenfield site which lies within the village boundary. While very well related to existing development, it is considered that this site performs an important role in maintaining the character of the village. As such it is considered to be unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
42/030	Thundridge	13.2	N - This is a large greenfield site to the south of Thundridge. The site is considered to be unsuitable as it is located in the Green Belt, is poorly related to the existing settlement and would represent an unacceptable incursion of built development into an open countryside setting.	N - Land ownership is unknown	Y - Site is considered achievable.	No	No	No	No
42/032	Thundridge	1.33	N - This greenfield site lies adjacent to the village boundary to the north west of High Cross. The site is considered to be unsuitable as it lies within the Rural Area Beyond the Green Belt, is poorly related to the existing settlement and would represent an unacceptable incursion of built development into an open countryside setting.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
42/033	Thundridge	3.8	N - This large greenfield site is located to the west of Thundridge, a Group 2 village. While it is relatively well related to the existing settlement, the site is considered to be unsuitable due to its location within the Green Belt and development would result in an unacceptable incursion into an open countryside setting.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
42/034	Thundridge	1.61	N - This greenfield site lies to the east of High Cross and immediately adjacent to the existing village boundary, with the A10 to the east. Access to this site is considered to be a major constraint, and as such it is considered that the site is unsuitable.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
42/035	Thundridge	1.02	N - This is a greenfield site located off Poles Lane within a designated Wildlife Site. The site is considered to be unsuitable as it is within the Green Belt and is poorly related to the existing settlement.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
43/002	Walkern	248	N - This is a large greenfield site predominantly in agricultural use. The southern part of the site lies immediately to the east of Stevenage and the northern half of the site is located to the east of Box Wood, an Ancient Woodland and Conservation Wildlife site. The southern half could be appropriate as part of an urban extension to Stevenage, although consideration would have to be given to the impact on the Beane valley. The site is currently unsuitable due to its location within the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - The site is considered to be achievable at present. However, in order to deliver a strategic scale of development, major infrastructure would be required. Further work would therefore be required to assess achievability.				The site could form part of a larger strategic scale development in this location. The site could be considered to be either deliverable or developable depending on the nature and scale of development.
43/003	Walkern	9.82	N - This is a greenfield site located to the east of Gresley Way in Stevenage. The site could be appropriate as part of an urban extension to Stevenage, although consideration would have to be given to the impact on the Beane valley. The site is currently unsuitable due to its location within the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - The site is considered to be achievable at present. However, in order to deliver a strategic scale of development, major infrastructure would be required. Further work would therefore be required to assess achievability.				The site could form part of a larger strategic scale development in this location. The site could be considered to be either deliverable or developable depending on the nature and scale of development.
43/004	Walkern	0.54	N - The site is located on the eastern side of the village, adjacent to the village boundary, and is reasonably well related to existing development. The site is considered to be unsuitable due to its location within the Rural Area Beyond the Green Belt. Winters Lane is also extremely narrow which is likely to cause severe access difficulties.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
43/005	Walkern	0.13	N - This greenfield site is located within the Rural Area Beyond the Green Belt. Any development in this location would represent an encroachment into the countryside. Clay End is a very small Group 3 village with little or no access to services and facilities and is considered to be an unsustainable location for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
43/006	Walkern	0.16	N - This greenfield site is located within the Rural Area Beyond the Green Belt. Any development in this location would represent an encroachment into the countryside. Clay End is a very small Group 3 village with little or no access to services and facilities and is considered to be an unsustainable location for development.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
43/007	Walkern	0.2	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
43/008	Walkern	0.18	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
43/009	Walkern	1.89	Site not assessed as permission has been granted and the principle of development is therefore accepted.						
43/010	Walkern	0.34	N - This is a greenfield site located adjacent to the village boundary, within the Walkern Conservation Area and opposite Grade II listed buildings to the north. The site is relatively well related to the existing built up area, however, the site is currently considered to be unsuitable due to its location within the Rural Area Beyond the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.			Up to 9 dwellings Subject to a review of the village boundary through a Neighbourhood Plan for Walkern.	
43/011	Walkern	0.12	N - This is a greenfield site located adjacent to the village boundary, within the Walkern Conservation Area. The site is relatively well related to the existing built up area, however, the site is currently considered to be unsuitable due to its location within the Rural Area Beyond the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.			Up to 3 dwellings Subject to a review of the village boundary through a Neighbourhood Plan for Walkern.	

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
44/001	Wareside	39.43	N – This large greenfield site is located in the Green Belt to the north of Ware, adjacent to Fanhams Hall, a registered Park and Garden. The site is currently unsuitable; however, it offers the opportunity to provide a sustainable urban extension to Ware subject to a review of the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - It is considered that the site is achievable. Development in this location has been assessed through the Delivery Study and is considered to be viable.				The site could provide strategic scale development, either in isolation or as part of a wider scheme, to the north and east of Ware, subject to a review of the Green Belt
44/002	Wareside	0.28	N - This is a brownfield site to the north of Babbs Green, a very small Group 3 settlement, which contains a number of existing farm buildings. The site is considered to be unsuitable as it is located within the Rural Area Beyond the Green Belt and is isolated from local services and facilities.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
44/003	Wareside	0.18	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
44/004	Wareside	0.69	N - This is a greenfield site to the north of Babbs Green, a very small Group 3 settlement. The site is considered to be unsuitable as it is located within the Rural Area Beyond the Green Belt and is isolated from local services and facilities.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
44/005	Wareside	99.18	N – This large greenfield site is located in the Green Belt to the north and east of Ware. The site is currently unsuitable; however, it offers the opportunity to provide a sustainable urban extension to Ware subject to a review of the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - It is considered that the site is achievable. Development in this location has been assessed through the Delivery Study and is considered to be viable.				The site could provide strategic scale development, either in isolation or as part of a wider scheme, to the north and east of Ware, subject to a review of the Green Belt

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
44/006	Wareside	1.5	N – This greenfield site is located in the Green Belt to the north east of Ware, partly within an Area of Archaeological Significance. The site is currently unsuitable; however, the site does relate well to other SLAA sites in the area, and there may be potential for strategic scale development, including necessary services and facilities, which would relate well to Ware.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - It is considered that the site is achievable. Development in this location has been assessed through the Delivery Study and is considered to be viable.				The site could provide strategic scale development, as part of a wider scheme, to the north and east of Ware, subject to a review of the Green Belt
45/001	Watton-at-Stone	0.39	Y – This brownfield site is located within the built up area of Watton-at-Stone where the principle of development is acceptable. The portakabins which were stored there by the previous tenant have all been removed and just two small, obsolete workshop buildings remain. It has not been in employment use and therefore Policy EDE2 does not apply. The premises have been vacant for over four years.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable, although means of access will need to be formalised with a third party owner.	Up to 10 dwellings The site is considered deliverable			
45/002	Watton-at-Stone	0.71	N – This brownfield site is located to the south of Watton-at-Stone, adjacent to a designated Wildlife Site. The site is also located within an Area of Archaeological Significance. Planning permission for residential development has previously been refused. The site is considered to be unsuitable due its rural location within the Green Belt.	Y - The site has been promoted through the Call for Sites by two landowners and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
45/003	Watton-at-Stone	0.11	Site not assessed as it falls below the 0.25ha threshold as identified by national policy.						
45/004	Watton-at-Stone	2.08	N - This greenfield site is located to the north of Watton at Stone, a Group 1 settlement. The site lies within an Area of Archaeological Significance. While the site is well related to the existing settlement, it is currently considered to be unsuitable due its location within the Green Belt. However, the site could help enable the delivery of 10% growth within the village if identified through a Neighbourhood Plan.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.			Up to 52 dwellings The site is considered deliverable subject to a review of the Green Belt through a Neighbourhood Plan for Watton at Stone.	

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
45/007	Watton-at-Stone	2.2	N - This greenfield site is located to the north west of Watton at Stone, a Group 1 settlement. While the site is well related to the existing settlement, it is currently considered to be unsuitable due its location within the Green Belt. However, the site could help enable the delivery of 10% growth within the village if identified through a Neighbourhood Plan.	Y - Although not promoted through the Call for Sites, landowner and intentions are known. Site is therefore considered to be available.	Y - Site is considered achievable.			Up to 55 dwellings The site is considered deliverable subject to a review of the Green Belt through a Neighbourhood Plan for Watton at Stone.	
45/009	Watton-at-Stone	1.3	N - This greenfield site is located to the south of Watton at Stone within an Area of Archaeological Significance. Whilst the site has a reasonable relationship to the form of the village, it is not clear how a satisfactory access could be provided to the site. The site is currently considered to be unsuitable as it is located within the Green Belt and is currently in allotment use and safeguarded as such in the Local Plan.	N - The site was not submitted through the Call for Sites and it is therefore not known whether the site is available.	Y - Site is considered achievable.	No	No	No	No
46/001	Westmill	0.6	N - This greenfield site is located to the west of Westmill, a Group 2 village. Although it would not represent infill development in a Group 2 village, the site could be brought forward if identified within a Neighbourhood Plan. However, the site is currently unsuitable due to its location within the Rural Area Beyond the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	Up to 10 dwellings The site is considered to be deliverable subject to a review of the settlement boundary through a Neighbourhood Plan for Westmill	No
47/001	Widford	0.53	Y - This site is located to the east of Widford, a Group 2 village. Part of the sites lies within an Area of Archaeological Significance. Development of the part of the site that is located within the built up area is considered to be suitable as it constitutes infill development in a Group 2 village. The area outside of the built up area is unsuitable as it is subject to Rural Area Beyond the Green Belt policy.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	Up to 5 dwellings The site is considered deliverable			

SLAA REF	PARISH	Site Area (Ha)	Suitable	Available	Achievable	Deliverable	Developable	Deliverable with Policy Change	Developable with Policy Change
47/002	Widford	1.66	N - This relatively large greenfield site is located to the east of Widford, a Group 2 village. The site is considered to be unsuitable as it is poorly related to the existing settlement and is located within the Rural Area Beyond the Green Belt. Development would also constitute an unacceptable incursion into open countryside.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	No	No
47/011	Widford	1.12	N - This relatively large greenfield site is located to the south of Widford. Although it would not represent infill development in a Group 2 village, the site could be brought forward if identified within a Neighbourhood Plan. However, the site is currently unsuitable due to its location within the Rural Area Beyond the Green Belt.	Y - The site has been promoted through the Call for Sites by the landowner and is considered to be available.	Y - Site is considered achievable.	No	No	Up to 10 dwellings The site is considered to be deliverable subject to a review of the settlement boundary through a Neighbourhood Plan for Widford.	No

SLAA REF	PARISH	SITE NAME	ADDRESS	SETTLEMENT	LOCAL POSTCODE
01/001	Bishop's Stortford Town	Land at Rye Street	Rye Street	Bishop's Stortford	CM23 2HY
01/002	Bishop's Stortford Town	Land to the Rear of 165 and 167 Rye Street	Rye Street	Bishop's Stortford	CM23 2HE
01/003	Bishop's Stortford Town	Woodlands Lodge	Dunmow Road	Bishop's Stortford	CM23 5QX
01/004	Bishop's Stortford Town	Land west of Farnham Road (south of bypass)	Farnham Road	Bishop's Stortford	CM23 1JJ
01/005	Bishop's Stortford Town	B.J. Ashpole Ltd	Southmill Road	Bishop's Stortford	CM23 3DJ
01/006	Bishop's Stortford Town	34 Rye Street	Rye Street	Bishop's Stortford	CM23 2HG
01/007	Bishop's Stortford Town	Land adjacent to 9 Dolphin Way	Dolphin Way	Bishop's Stortford	CM23 2AH
01/008	Bishop's Stortford Town	Land at Hoggates End	Whitehall Lane	Bishop's Stortford	CM23 2JH
01/009	Bishop's Stortford Town	Land to the rear of 37-57 Haymeads Lane	Haymeads Lane	Bishop's Stortford	CM23 5JJ
01/010	Bishop's Stortford Town	Bishop's Stortford Football Club	Woodside Park	Bishop's Stortford	CM23 5RG
01/011	Bishop's Stortford Town	Thorley Place	Thorley Lane East	Bishop's Stortford	CM23 4BH
01/012	Bishop's Stortford Town	Apton Road Car Park	Apton Road	Bishop's Stortford	CM23 3JN
01/014	Bishop's Stortford Town	Land at Bishop's Stortford Golf Club	Manor Links	Bishop's Stortford	CM23 5RA
01/015	Bishop's Stortford Town	Blyth Farm	Gypsy Lane	Bishop's Stortford	CM23 1HA

SLAA REF	PARISH	SITE NAME	ADDRESS	SETTLEMENT	LOCAL POSTCODE
01/016	Bishop's Stortford Town	Rock Cottage, Blyth Farm	Gypsy Lane	Bishop's Stortford	CM23 1HA
01/017	Bishop's Stortford Town	Land north of Great Hadham Road & east of Monkswood Drive	Great Hadham Road	Bishop's Stortford	CM23 4BT
01/018	Bishop's Stortford Town	Land South of Maze Green Road	Maze Green Road	Bishop's Stortford	
01/019	Bishop's Stortford Town	Junior School Site, Bishop's Stortford College	Maze Green Road	Bishop's Stortford	CM23 2PH
01/020	Bishop's Stortford Town	Land at Dane O'Coys Road	Dane O'Coys Road	Bishop's Stortford	CM23 2RN
01/021	Bishop's Stortford Town	Whitehall Leys	Whitehall Road	Bishop's Stortford	CM23 2JL
01/022	Bishop's Stortford Town	Land north of 221 Rye Street	Rye Street	Bishop's Stortford	CM23 2HE
01/023	Bishop's Stortford Town	Land north-east of Farnham Road	Farnham Road	Bishop's Stortford	CM23 2JF
01/024	Bishop's Stortford Town	ASRs 1-5, SCA and adjoining Green Belt	Land south of A120	Bishop's Stortford	CM23 2JN
01/025	Bishop's Stortford Town	Bishop's Stortford Air Cadet HQ	Knights Row	Bishop's Stortford	CM23 3GR
01/027	Bishop's Stortford Town	Land adjacent to Bournebrook House	Farnham Road	Bishop's Stortford	CM23 1JJ

SLAA REF	PARISH	SITE NAME	ADDRESS	SETTLEMENT	LOCAL POSTCODE
01/028	Bishop's Stortford Town	Council Offices & land at The Causeway	The Causeway	Bishop's Stortford	CM23 2EN
01/030	Bishop's Stortford Town	Land at Hallingbury Road	Hallingbury Road	Bishop's Stortford	CM23 5LE
01/031	Bishop's Stortford Town	Oxford House	London Road	Bishop's Stortford	CM23 3LA
01/032	Bishop's Stortford Town	Bishop's Stortford Delivery Office & Post Office	South Road	Bishop's Stortford	CM23 3AA
01/033	Bishop's Stortford Town	Land at Styleman's Farm	Hallingbury Road	Bishop's Stortford	CM22 7QJ
01/042	Bishop's Stortford Town	Land west of Farnham Road (north of bypass)	Farnham Road	Bishop's Stortford	CM23 1JJ
01/043	Bishop's Stortford Town	Land at Bournebrook & Partridges	Farnham Road	Bishop's Stortford	CM23 1JJ
01/119	Bishop's Stortford Town	The Mill Site	Dane Street	Bishop's Stortford	CM23 3XZ
01/120	Bishop's Stortford Town	The Goods Yard	Station Road	Bishop's Stortford	CM23 3BL
01/136	Bishop's Stortford Town	Land at Bishop's Stortford Golf Club	Dunmow Road	Bishop's Stortford	CM23 5RA
01/139	Bishop's Stortford Town	Patmore Close and Fire Station	Hadham Road	Bishop's Stortford	CM23 2PY
01/157	Bishop's Stortford Town	Sports field associated with Birchwood High School	Dunmow Road	Bishop's Stortford	CM23 5HR
01/158	Bishop's Stortford Town	Land east of London Road	London Road	Bishop's Stortford	CM23 4AE

SLAA REF	PARISH	SITE NAME	ADDRESS	SETTLEMENT	LOCAL POSTCODE
01/159	Bishop's Stortford Town	Land east of Thorley Lane East	Thorley Lane East	Bishop's Stortford	CM23 4BH
01/160	Bishop's Stortford Town	Land south of Cannons Mill Lane	Cannons Mill Lane	Bishop's Stortford	
01/161	Bishop's Stortford Town	Land north of Cannons Mill Lane	Cannons Mill Lane	Bishop's Stortford	
01/162	Bishop's Stortford Town	Finch Croft, Thorley Lane West	Thorley Lane West	Bishop's Stortford	CM23 4BN
02/001	Buntingford Town	Land south of Owles Lane	Owles Lane	Buntingford	SG9 9JA
02/002	Buntingford Town	Land to the rear of Snells Mead	Station Road	Buntingford	SG9 9HT
02/003	Buntingford Town	Land off Longmead/Baldock Road	Longmead	Buntingford	
02/004	Buntingford Town	Land south of the Causeway & north of Hare Street Road	Hare Street Road	Buntingford	SG9 9HN
02/005	Buntingford Town	Land west of Buntingford (between Monks Walk & A10)	Monks Walk	Buntingford	SG9 9JS
02/006	Buntingford Town	Aspenden Bridge (opposite Watermill Industrial Estate)	Aspenden Road	Buntingford	SG9 9JS
02/007	Buntingford Town	Former Sainsbury's Depot	London Road	Buntingford	SG9 9JR

SLAA REF	PARISH	SITE NAME	ADDRESS	SETTLEMENT	LOCAL POSTCODE
02/008	Buntingford Town	Land west of London Road	London Road	Buntingford	SG9 9JY
02/009	Buntingford Town	Land west of Ermine Street	Ermine Street	Buntingford	SG9 9RS
02/011	Buntingford Town	Land at Aspenden Road	Aspenden Road	Buntingford	SG9 9JS
03/001	Hertford Town	Bengeo Plant Nursery	Sacombe Road	Hertford	SG14 3HG
03/002	Hertford Town	National Grid Site/ Norbury Woodyard	Mead Lane	Hertford	SG13 7AJ
03/003	Hertford Town	Land north of Molewood Road	Molewood Road	Hertford	SG14 3NX
03/004	Hertford Town	Land east of North Road	North Road	Hertford	SG14 2BZ
03/005	Hertford Town	Land west of Mangrove Road	Mangrove Road	Hertford	SG13 8AW
03/006	Hertford Town	Land adjacent to London Road	London Road	Hertford	SG13 8AJ
03/007	Hertford Town	The Old Orchard	Old Hertingfordbury Road	Hertford	SG14 2TG
03/008	Hertford Town	Hertford Fire Station & Fire Service HQ	Old London Road	Hertford	SG13 7LD
03/009	Hertford Town	West Street Allotments	West Street	Hertford	SG13 8EZ
03/010	Hertford Town	Land west of Thieves Lane & south of Welwyn Road	Thieves Lane	Hertford	SG14 2DG

SLAA REF	PARISH	SITE NAME	ADDRESS	SETTLEMENT	LOCAL POSTCODE
03/012	Hertford Town	13-19 Castle Mead Gardens	Castle Mead Gardens	Hertford	SG14 1JZ
03/013	Hertford Town	Land to the East of East Lodge, Balls Park	Mangrove Road	Hertford	
03/014	Hertford Town	Land west of London Road Cottages	Balls Park, Lonon Road	Hertford	SG13 8AR
03/015	Hertford Town	Land to the rear of Fireflies	9 The Avenue	Hertford	SG14 3DQ
03/016	Hertford Town	1-14 Dicker Mill	Dicker Mill	Hertford	SG13 7AA
03/017	Hertford Town	30-34 and 33-41 Chambers Street	Chambers Street	Hertford	SG14 1PL
03/018	Hertford Town	Former McMullen Brewery	Hartham Lane	Hertford	
03/019	Hertford Town	Goldings Manor	Waterford	Hertford	SG14 2WH
03/020	Hertford Town	Land at Braziers Field	Braziers Field	Hertford	SG13 7JF
03/021	Hertford Town	Goldings, Orchard House	Broad Oak End	Hertford	SG14 2JA
03/022	Hertford Town	Chelmsford Lodge	Valeside	Hertford	SG14 2AR
03/023	Hertford Town	Adjacent 145 North Road	North Road	Hertford	SG14 2BY
03/024	Hertford Town	Hertford Delivery Office	Greencoates	Hertford	SG13 8AB
03/025	Hertford Town	Land west of Mangrove Road	Mangrove Road	Hertford	SG13 8AN

SLAA REF	PARISH	SITE NAME	ADDRESS	SETTLEMENT	LOCAL POSTCODE
03/111	Hertford Town	Land east of Marshgate Drive (residual part of employment area)	Marshgate Drive	Hertford	SG13 7BJ
03/120	Hertford Town	Land at Wadesmill Road	Wadesmill Road	Hertford	SG14 3HJ
03/134	Hertford Town	Land south of Hornsmill Road	Hornsmill Road	Hertford	SG13 8HD
03/152	Hertford Town	Land north of Welwyn Road	Welwyn Road	Hertford	SG14 2HQ
03/153	Hertford Town	Land east of Queens Road	69 Queens Road	Hertford	SG13 8BB
03/154	Hertford Town	Land at St Marys Lane	St Marys Lane	Hertingfordbury	SG14 2LE
03/156	Hertford Town	6-10 Marshgate Trading Estate	Marshgate Drive	Hertford	SG13 7JY
03/157	Hertford Town	Hertford Industrial Estate	Caxton Hill	Hertford	SG13 7NE
04/001	Sawbridgeworth Town	Land at 'The Colt'	Redricks Lane	Sawbridgeworth	CM21 0RL
04/002	Sawbridgeworth Town	Land to the North of Dell	London Road	Spellbrook	CM23 4AU
04/003	Sawbridgeworth Town	Land to the rear of 4 Newports	4 Newports	Sawbridgeworth	CM21 0HP
04/004	Sawbridgeworth Town	Land adjacent to east edge of Rowney Wood	Chaseways	Sawbridgeworth	CM21 0AS
04/005	Sawbridgeworth Town	Land at Thomas Rivers Hospital	High Wych Road	Sawbridgeworth	CM21 0AB
04/006	Sawbridgeworth Town	Land at Chalk's Farm	West Road	Sawbridgeworth	CM21 0DA

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04/007	Sawbridgeworth Town	Land west of Sawbridgeworth		Sawbridgeworth	CM21 0BP
04/008	Sawbridgeworth Town	Land at Northfield House	Cambridge Road	Sawbridgeworth	CM21 9BZ
04/009	Sawbridgeworth Town	Land north of Chaseways	Chaseways	Sawbridgeworth	CM21 0HS
04/010	Sawbridgeworth Town	Land adjacent to Primrose Cottage	High Wych Road	Sawbridgeworth	CM21 0HH
04/011	Sawbridgeworth Town	The Piggeries (land south & west of the Coach House)	Redricks Lane	Sawbridgeworth	CM21 0RL
04/012	Sawbridgeworth Town	The Bungalow and land to the east	Three Mile Pond Farm	Sawbridgeworth	CM21 9BZ
04/013	Sawbridgeworth Town	Brickwell Fields (land north of West Road)	West Road	Sawbridgeworth	CM21 0BL
04/014	Sawbridgeworth Town	Land south of Bridgefoot House	Station Road	Sawbridgeworth	CM21 9JZ
04/015	Sawbridgeworth Town	Land west of the River Stort and south of Station Road	Station Road	Sawbridgeworth	CM21 9JE
04/017	Sawbridgeworth Town	Land north & south of Spellbrook Lane West	Spellbrook Lane West	Spellbrook	CM23 4BU
04/018	Sawbridgeworth Town	Land at Thomas Rivers Nursery	High Wych Road	Sawbridgeworth	CM21 0AB

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04/055	Sawbridgeworth Town	Triangle Nurseries	Chaseways	Sawbridgeworth	CM21 0AS
04/056	Sawbridgeworth Town	Land at Kecksys Farm	Cambridge Road	Sawbridgeworth	CM21 9BZ
04/060	Sawbridgeworth Town	Lock Pavillion	Spellbrook Lane East	Spellbrook	CM23 7SE
04/061	Sawbridgeworth Town	Paddock adjacent to the Old Cottage	Spellbrook Lane West	Spellbrook	CM23 4AY
04/062	Sawbridgeworth Town	Land north of Station Road	Station Road	Sawbridgeworth	CM21 9JY
05/001	Ware Town	Presdales Pit	Hoe Lane	Ware	SG12 9NZ
05/002	Ware Town	Leaside Depot	Widbury Hill	Ware	SG12 7QE
05/003	Ware Town	Nuns' Triangle (land bound by A10/A1170/Quincey Road)	Wadesmill Road	Ware	SG12 0UQ
05/004	Ware Town	Land south of Fanhams Hall Road & east of Trinity Centre	Fanhams Hall Road	Ware	SG12 7JQ
05/005	Ware Town	Horticultural Nursery, Presdales School	Hoe Lane	Ware	SG12 7JQ
05/007	Ware Town	Baldock Street Car Park	Baldock Street	Ware	SG12 9DX
05/008	Ware Town	Old Hertfordians Rugby Club	Hoe Lane	Ware	SG12 9NZ
05/009	Ware Town	Land East of Trinity Centre		Ware	
05/010	Ware Town	Ware Library and the Old Fire Station	High Street	Ware	SG12 9XL

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05/011	Ware Town	2B Star Street	Star Street	Ware	SG12 7AA
05/013	Ware Town	Land at Rush Green	Hoe Lane	Ware	SG12 9NZ
05/014	Ware Town	Land at Crane Mead	Crane Mead	Ware	SG12 9FJ
05/015	Ware Town	Swains Mill	Crane Mead	Ware	
05/016	Ware Town	Land at Chadwell Springs Golf Course	Hertford Road	Ware	SG12 9LE
05/017	Ware Town	Land at Little Acres	Little Acres	Ware	SG12 9JW
05/018	Ware Town	Cintel Site	Watton Road	Ware	SG12 0AE
05/019	Ware Town	Hale Club	Hoe Lane	Ware	SG12 9NZ
05/020	Ware Town	Land east of Ware (to the rear of Cozens Road)		Ware	SG12 7HL
05/021	Ware Town	Land at King George Road	King George Road	Ware	SG12 7DT
05/022	Ware Town	Swains Mill & land south of Crane Mead	Crane Mead	Ware	SG12 9PY
05/090	Ware Town	Land at Trapstyle Woods	Trapstyle Road	Ware	
05/096	Ware Town	Viaduct Road		Ware	
06/001	Albury	Bride Croft (land south of Upwick Green Road)	Upwick Green Road	Upwick, Nr Albury	SG11 2JX

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06/002	Albury	Salmon Mead (land east of Tatts Cottage; now known as The Nook)	Upwick Green Road	Upwick, Nr Albury	SG11 2JX
07/001	Anstey	Land south-east of Anstey village school	Anstey Road	Anstey	SG9 0BY
07/002	Anstey	Silkmead Farm	B1368	Hare Street	SG9 0DX
08/001	Ardeley	Kingswick	White Hill	Cromer	SG2 7QA
09/001	Aspenden	Land north of Buntingford Business Park	Baldock Road	Buntingford	SG9 9DW
10/001	Aston	Palletts Orchard	Stringers Lane	Aston	SG2 7EF
10/002	Aston	Coppers Field	Aston End Road	Aston	SG2 7EX
10/003	Aston	Little Orchard	Dene Lane	Aston	SG2 7EU
10/004	Aston	Lammas Cut	Dene Lane	Aston	SG2 7EU
10/006	Aston	Land at Aston End	Lanterns Lane	Aston	SG2 7HH
10/007	Aston	Weavers Field	Gresley Way	Stevenage	SG2 7HF
11/001	Bayford	Land to the rear of 4-6 Ashendene Road	Ashendene Road	Bayford	SG13 8PX
11/003	Bayford	Land at The Stables	Bayford Lane	Bayford	SG13 8PR
12/001	Bengeo Rural	Land at High Trees Farm	High Trees Farm	Chapmore End	SG12 0HF
12/002	Bengeo Rural	Land at Bourne Honour	Ware Road	Tonwell	SG12 0HW
12/003	Bengeo Rural	Land rear of Dormers	Crouchfield	Chapmore End	SG12 0NZ

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13/001	Benington	Land west & north of Oak Tree Surgery	Oak Tree Close	Benington	SG2 7QZ
13/002	Benington	Land west of 22 Burns Green	Burns Green	Benington	SG2 7DA
13/003	Benington	Land west of 90 Town Lane	Town Lane	Benington	SG2 7BT
13/004	Benington	Land south of 2A Whempstead Road	Whempstead Road	Benington	SG2 7BX
13/005	Benington	Land east of 25 Hebing End	Hebing End	Benington	SG2 7DD
13/006	Benington	Land north of 68 Whempstead Road	Whempstead Road	Benington	SG2 7DE
13/008	Benington	Land at the Old Chalk Pit	Church Green	Benington	SG2 7LH
13/009	Benington	Whitehall Stables	Whitehall Farm, Walkern Road	Watton-at-Stone	SG14 3RP
13/010	Benington	Land north of High Elms Lane	High Elms Lane	Watton-at-Stone	SG14 3RL
13/011	Benington	Land adjacent to Frogmore Lodge	Walkern Road	Watton-at-Stone	SG14 3RN
13/012	Benington	Holbrook Barns	Benington Road	Benington	SG2 7EA
13/013	Benington	Land adjacent to The Bell PH	Town Lane	Benington	SG2 7LA
13/018	Benington	Front paddock on Walkern Road	Benington Bury Farm, Walkern Road	Benington	SG2 7LN

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15/001	Braughing	Arden Meadow	Friars Road	Braughing	SG11 2NH
15/002	Braughing	Land east of B1368	Quinbury Farm, Hay Street	Braughing	SG11 2PQ
15/003	Braughing	Land off Green End & Gravelly Lane	Gravelly Lane	Braughing	SG11 2PU
15/004	Braughing	Land off Green End	Green End	Braughing	SG11 2PU
15/005	Braughing	Land north of 21 Green End	Green End	Braughing	SG11 2PG
15/007	Braughing	Land to the rear of Chesnuts	Hull Lane	Braughing	SG11 2PE
15/016	Braughing	Land west of Station Road	Station Road	Braughing	SG11 2PQ
15/019	Braughing	Land west of Station Road	Station Road	Braughing	SG11 2PQ
15/020	Braughing	Land north-east of Puckeridge (east of Wickham Hill)	Wickham Hill	Puckeridge	SG11 2PA
16/001	Brent Pelham	Land adjacent to Pumphill Cottage	Pumphill	Brent Pelham	SG9 0HQ
17/001	Brickendon Liberty	Birch Farm	White Stubbs Lane	Broxbourne	EN10 7QA
17/002	Brickendon Liberty	Land west of Brickendon Lane	Brickendon Lane	Hertford	SG13 8HT
17/003	Brickendon Liberty	Land at Brickendon Grange	Pembridge Lane	Brickendon	SG13 8PB

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18/001	Buckland	Land adjacent to 'Habitat'		Buckland	
19/001	Cottered	Trinity Meadow	Thirty Acre Farm	Throcking	SG9 9RD
19/002	Cottered	Land to the rear of Peasecroft & The Crescent	Peasecroft & The Crescent	Cottered	SG9 9QR
19/003	Cottered	The Paddock	Warren Lane	Cottered	SG9 9QA
19/004	Cottered	Land at Stocking Hill Lane	Stocking Hill Lane	Cottered	
19/005	Cottered	Land Between Old Rectory and Magpie Farm		Cottered	SG9 9QP
20/001	Datchworth	Home Farm	76 Bramfield Lane	Bulls Green	SG3 6RZ
20/002	Datchworth	Pound Farm	Hollybush Lane	Datchworth	SG3 6RE
20/003	Datchworth	Land between 67 & 75 Burnham Green Road	Burnham Green Road	Burnham Green	AL6 0NH
20/009	Datchworth	Land at Hawkins Hall Lane	Hawkins Hall Lane	Datchworth	SG3 6RU
20/010	Datchworth	Land to the north of Turkey Farm Recreation Area	Brookbridge Lane	Datchworth	SG3 6SU
20/011	Datchworth	Land at 111 Burnham Green Road	Burnham Green Road	Burnham Green	AL6 0NH
20/012	Datchworth	Land at Hawkings Hall Farm	Hawkings Hall Farm	Datchworth	SG3 6RU
21/001	Eastwick & Gilston	Fiddlers Brook Stables	Church Lane	Gilston	CM20 2RF

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21/002	Eastwick & Gilston	Redricks, Hollingson Meads, Sayes Park, Gilston Park (part)	Marlers, Pye Corner	Gilston	CM20 2RD
21/004	Eastwick & Gilston	Land north of A414/Eastwick Road	Eastwick Road	Eastwick	CM20 2RG
21/005	Eastwick & Gilston	Land adjacent and to the rear of The Dusty Miller PH	Burnt Mill Lane	Eastwick	CM20 2QS
21/006	Eastwick and Gilston	Land south of Gilston Park House	Gilston Park	Gilston	CM20 2SF
21/009	Eastwick & Gilston	Land south of Eastwick Road & Redricks Lane	Redricks Lane	Gilston	CM20 2RP
22/001	Furneux Pelham	Land north of Lake Villas	Barleycroft End	Furneux Pelham	SG9 0LG
22/002	Furneux Pelham	Hollybush	The Street	Furneux Pelham	SG9 0JZ
22/003	Furneux Pelham	Land at Violets Lane	Barleycroft End	Furneux Pelham	SG9 0LL
22/004	Furneux Pelham	Land at Tinkers Hill	The Street	Furneux Pelham	SG9 0LJ
23/001	Great Amwell	Land to the rear of The Brooms	Lower Road	Great Amwell	SG12 9SZ
23/002	Great Amwell	Byfield Nursery	Gipsy Lane	Great Amwell	SG12 9RJ
23/003	Great Amwell	Land north of Jansus	Amwell Lane	Stanstead Abbots & St Margarets	SG12 8DX

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23/004	Great Amwell	Land surrounding Van Hages Garden Centre	Amwell Hill	Great Amwell	SG12 1PB
23/021	Great Amwell	Hillside Farm	Pepper Hill	Great Amwell	SG12 9SH
23/022	Great Amwell	Byfield Nursery & Landcroft	Pepper Hill	Great Amwell	SG12 9RG
25/001	Hertford Heath	Land west of London Road (opposite no's 87-119)	London Road	Hertford Heath	SG13 7RH
25/002	Hertford Heath	Land at Amwell Place Farm (east & west of Downfield Road)	Downfield Road	Hertford Heath	SG13 7RZ
25/003	Hertford Heath	The Roundings and land to the rear	The Roundings	Hertford Heath	SG13 7PX
26/001	Hertingfordbury	Water Hall Quarry Complex	Lower Hatfield Road	Little Berkhamsted	SG13 8LF
26/003	Hertingfordbury	Birchall Farm (land north of Birchall Lane)	Birchall Lane	Cole Green	SG14 2NR
26/004	Hertingfordbury	Hatfield Estate (land surrounding Munn's Farm)	Munn's Farm	Cole Green	SG14 2NL
26/005	Hertingfordbury	New England Nursery		Birch Green	SG14 2LR
26/006	Hertingfordbury	Land west of The Bury Farm	Bury Farm	Hertingfordbury	SG14 2LJ

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26/007	Hertingfordbury	Land east of The Bury Farm	Bury Farm	Hertingfordbury	SG14 2LJ
26/008	Hertingfordbury	Land adjacent to 12 The Old Coach Road	12 The Old Coach Road	Birch Green	
26/009	Hertingfordbury	Land south of Beechleigh		Birch Green	SG14 2LP
26/010	Hertingfordbury	Land to the East of Staines Green	The Old Coach Road	Staines Green	SG4 2LN
27/002	High Wych	Sayes Park Farm	High Wych Road	High Wych	CM21 0JE
27/003	High Wych	Land surrounding High Wych Grange	High Wych Road	High Wych	CM21 0JB
27/004	High Wych	Land south of 'Bakers Farm'	High Wych Lane	High Wych	CM21 0JL
27/008	High Wych	Land between Andor & Elms	Slough Road	High Wych	CM21 0LR
28/001	Hormead	Field 2769, land south of B1038	B1038	Hare Street	SG9 0EE
28/002	Hormead	Land to rear & east of Hormead C of E Primary School	B1038	Great Hormead	SG9 0PB
28/003	Hormead	Land west of Hormead Village Hall	B1038	Great Hormead	SG9 0PB
28/004	Hormead	Land to rear of Jubilee Cottages	Horseshoe Lane	Great Hormead	SG9 0NG

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28/005	Hormead	Land at Lamorna	B1368	Hare Street	SG9 0DX
29/001	Hunsdon	Land west of Little Samuel's Farm	Widford Road	Hunsdon	SG12 8NN
29/002	Hunsdon	Land north of Little Samuel's Farm	Widford Road	Hunsdon	SG12 8NN
29/003	Hunsdon	Little Samuel's Farm Estate	Widford Road	Hunsdon	SG12 8NN
29/004	Hunsdon	Eastern part of Briggens Estate (land east & west of Eastwick Road)	Eastwick Road	Hunsdon	SG12 8LG
29/005	Hunsdon	Land south of Drury Lane & east of allotments (southern plot)	Drury Lane	Hunsdon	SG12 8NU
29/006	Hunsdon	Land south of Tanners Way	Tanners Way	Hunsdon	SG12 8QD
29/015	Hunsdon	Hunsdon Lodge Farm	Drury Lane	Hunsdon	SG12 8NU
29/017	Hunsdon	Land at Dixon's Crane Yard	Acorn Street	Hunsdon	SG12 8PF
29/018	Hunsdon	Land at Buryholme	Hunsdonsbury	Hunsdon	SG12 8PW
29/019	Hunsdon	Woodholme Stock Yard	Hunsdonsbury	Hunsdon	SG12 8PS

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29/020	Hunsdon	Land south of Drury Lane & east of allotments (northern plot)	Drury Lane	Hunsdon	SG12 8NU
29/021	Hunsdon	Land at Hunsdon (between B180 & Acorn Street)	Acorn Street	Hunsdon	
29/022	Hunsdon	Land adjacent to Briggens Hotel		Stanstead Abbots	
30/001	Little Berkhamsted	Brookside and the Old Gravel Pit	Lower Hatfield Road	Little Berkhamsted	SG13 8LE
30/002	Little Berkhamsted	Land West of Church Road	Church Road	Little Berkhamsted	SG13 8LY
30/003	Little Berkhamsted	Land East of Church Road	Church Road	Little Berkhamsted	SG13 8LY
31/001	Little Hadham	Field 5155 (land south of Stortford Road)	Stonehouse Farm, Stortford Road	Little Hadham	SG11 2DX
31/002	Little Hadham	Land and buildings at Little Hadham	Church End Farm	Little Hadham	SG11 2DY
31/003	Little Hadham	Land at Bury Green Farm	Millfield Lane	Little Hadham	SG11 2HE
31/004	Little Hadham	Land at rear of Florence Cottage	The Ford	Little Hadham	SG11 2AY
31/005	Little Hadham	Paddock adjacent to Barrans		Bury Green	SG11 2ES

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31/006	Little Hadham	Land east of Ashcroft Farm	Stortford Road	Little Hadham	SG11 2DX
31/007	Little Hadham	Field behind Foxearth	Chapel Lane	Little Hadham	SG11 2AB
31/024	Little Hadham	Land south of Stortford Road	Stortford Road	Little Hadham	SG12 2DX
31/025	Little Hadham	Hadham Industrial Estate & Church End Farm		Little Hadham	SG11 2DY
31/026	Little Hadham	Land at Side Hilly	The Ford	Hadham Ford	SG11 2AT
31/027	Little Hadham	Land north of Pathway Cottages	The Ford	Hadham Ford	SG11 2BY
31/028	Little Hadham	Land north of Stanemedede	Albury Road	Little Hadham	SG11 2DN
31/029	Little Hadham	Land south of The Smithy	The Smithy	Little Hadham	SG11 2DA
31/030	Little Hadham	Land adjacent to Ashmeads	The Ford	Little Hadham	SG11 2AY
33/001	Much Hadham	Land to west of Hodge's Garage	Victoria Terrace	Much Hadham	SG10 6DF
33/002	Much Hadham	Land at Walnut Close	Walnut Close	Much Hadham	SG10 6AJ
33/004	Much Hadham	Land south of Ashleys	Widford Road	Much Hadham	SG10 6AT
33/005	Much Hadham	Dolan's Field (land north of New Barns Lane)	New Barns Lane	Much Hadham	SG10 6HH
33/012	Much Hadham	Land at Barn Cottage	Widford Road	Much Hadham	SG10 6AT

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33/013	Much Hadham	Land to the rear of North Leys	New Barns Lane	Much Hadham	SG10 6DB
33/014	Much Hadham	Land to the rear of North Leys	New Barns Lane	Much Hadham	SG10 6DB
33/015	Much Hadham	Wheatcroft	Kettle Green Road	Much Hadham	SG10 6DB
33/015a	Much Hadham	Wheatcroft	Kettle Green Road	Much Hadham	SG10 6DB
33/016	Much Hadham	Former Hadham Station	Millers View, Off Windmill Way	Much Hadham	SG10 6BN
35/001	Standon	A10 Timber Company	Gore Lane	Barwick Ford	SG11 1AL
35/002	Standon	Burrs Meadow	High Street	Standon	SG11 1LA
35/003	Standon	Lilymead	Mill End	Standon	SG11 1LS
35/004	Standon	Land at Café Field (land north of A120)	Standon Hill	Puckeridge	SG11 1SA
35/005	Standon	Land to rear of Lamb and Flag PH	Ermine Street	Colliers End	SG11 1ER
35/007	Standon	Land south of Dowsetts Lane	Dowsetts Lane	Colliers End	SG11 1ET
35/008	Standon	Land north of St Mary's Church	Ermine Street	Colliers End	SG11 1EG
35/010	Standon	Former Kerry Foods site	Station Road	Standon	SG11 1QN
35/011	Standon	Hopsons Site	Stortford Road	Standon	SG11 1PH
35/012	Standon	Land north of Barnacres		Colliers End	SG11 1ER
35/013	Standon	Camps Field	Ermine Street	Colliers End	SG11 1EG

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35/014	Standon	Slaughterhouse/Orchard (land opposite St Mary's Church)	Ermine Street	Colliers End	SG11 1ED
35/015	Standon	Ryders Mead	Ermine Street	Colliers End	SG11 1DN
35/016	Standon	Land at Wickham Hill	Wickham Hill	Puckeridge	SG11 1RR
35/017	Standon	The Chestnuts & Glanton	Cambridge Road	Puckeridge	SG11 1SA
35/018	Standon	Bromley Farm Yard	Bromley Lane	Bromley, Nr Standon	SG11 1NY
35/019	Standon	Land west of Arches Hall Cottages	Morley Lane	Latchford, Nr Standon	SG11 1QX
35/033	Standon	Land west of Cambridge Road	Cambridge Road	Puckeridge	SG11 1SA
35/034	Standon	Land east of Cambridge Road	Cambridge Road	Puckeridge	SG11 1SA
35/036	Standon	Land east of Buntingford Road	Buntingford Road	Puckeridge	SG11 1RT
35/037	Standon	Land Adjacent to Stortford Road		Standon	
35/038	Standon	Land at Mentley Lane West		Puckeridge	
36/001	Stanstead Abbots	Kitten Hill (land east of Hunsdon Road & north of Roydon Road)	Kitten Lane	Stanstead Abbots	SG12 8JR

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36/002	Stanstead Abbots	Land north of Marsh Lane	Marsh Lane	Stanstead Abbots	SG12 8HH
36/003	Stanstead Abbots	Land north of Marsh Lane (adjacent to the Mill Stream)	Marsh Lane	Stanstead Abbots	SG12 8HL
36/006	Stanstead Abbots	David Websters	Netherfield Lane	Stanstead Abbots	SG12 8HE
36/007	Stanstead Abbots	Land off Netherfield Lane (north of David Websters)	Netherfield Road	Stanstead Abbots	SG12 8HE
36/008	Stanstead Abbots	Tennis Court, 1 The Abbots	Cappell Lane	Stanstead Abbots	SG12 8AR
36/016	Stanstead Abbots	Land at Willowthorpe	High Street	Stanstead Abbots	SG12 2AS
36/017	Stanstead Abbots	Atkin Bros Nursery	Marsh Lane	Stanstead Abbots	SG12 8HH
36/018	Stanstead Abbots	Land West of Chapelfields	Cappell Lane	Stanstead Abbots	SG12 8BX
37/001	Stanstead St Margarets	Land north and south of A414	A414	Stanstead St Margarets	SG12 8EH
37/002	Stanstead St Margarets	Land west of Ware Road	Springle House, Hailey		SG13 7NZ
37/003	Stanstead St Margarets	The Wilderness (land between Hoddesdon Road & the New River)	Hoddesdon Road	Stanstead St Margarets	SG12 8EG
37/004	Stanstead St Margarets	Hillside Nursery	Ware Road	Hoddesdon	SG13 7NZ

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38/001	Stapleford	Little Gobions	Gobions Lane	Stapleford	SG14 2RB
38/002	Stapleford	Hubbards	Gobions Lane	Stapleford	SG14 2RB
40/001	Tewin	Land adjacent to Cowper C of E School	Cannons Meadow	Tewin	AL6 0JU
40/002	Tewin	Seven Acres	49 Upper Meadow	Tewin	AL6 0LE
40/003	Tewin	Land east of Upper Green Road	Upper Green Road	Tewin	AL6 0LH
40/004	Tewin	Land at junction of Upper Green Road & Tewin Hill	Upper Green Road	Tewin	AL6 0LU
40/007	Tewin	Land rear of 29 Upper Green Road	Upper Green Road	Tewin	AL6 0LE
40/008	Tewin	Land east of Upper Green Road	Upper Green Road	Tewin	AL6 0LQ
40/022	Tewin	Land at Tewin Grove	B1000	Tewin	
41/001	Thorley	Land north of Twyford Bury	Twyford Lane	Bishop's Stortford	CM22 7QA
41/002	Thorley	Land south of Whittington Way	Whittington Way	Bishop's Stortford	CM23 4AS
41/003	Thorley	Thorley Wash Grange	London Road	Bishop's Stortford	CM23 4AT
41/005	Thorley	Land at Pig Lane	Twyford Bury Lane	Bishop's Stortford	CM22 7QA
41/007	Thorley	Land east of London Road	London Road	Bishop's Stortford	CM23 4AP
41/008	Thorley	Land at 1 Thorley High	Thorley Street	Bishop's Stortford	CM23 4AR

SLAA REF	PARISH	SITE NAME	ADDRESS	SETTLEMENT	LOCAL POSTCODE
42/001	Thundridge	The Football Pitches (land south of Dane End Road)	Dane End Road	High Cross	SG11 1BG
42/002	Thundridge	Land rear of Rennesley Farm	Anchor Lane	Wadesmill	SG12 0TE
42/003	Thundridge	Land east of Cambridge Road	Cambridge Road	Wadesmill	SG12 0TS
42/004	Thundridge	Land rear of Puller Memorial JMI	High Road	High Cross	SG11 1AW
42/005	Thundridge	Land south of Cold Christmas Lane	Cold Christmas Lane	Thundridge	SG12 7SW
42/006	Thundridge	Sutes Farm	High Road	High Cross	SG11 1BE
42/007	Thundridge	Land north of 24 Cambridge Cottages	High Road	High Cross	SG11 1BD
42/008	Thundridge	Land to rear of Cambridge Cottages	High Road	High Cross	SG11 1AZ
42/009	Thundridge	Land north of North Drive	North Drive	High Cross	SG11 1AU
42/010	Thundridge	Land at Oakley Coach Builders	High Road	High Cross	SG11 1AD
42/011	Thundridge	Land at Oakley Coach Builders	High Road	High Cross	SG11 2AD
42/012	Thundridge	Sawtrees Yard	Cold Christmas Lane	Sawtrees, Nr Barwick	SG12 7SL

SLAA REF	PARISH	SITE NAME	ADDRESS	SETTLEMENT	LOCAL POSTCODE
42/013	Thundridge	Land south of Cold Christmas Lane (adjacent to Swangles Farm)	Cold Christmas Lane	Cold Christmas	SG12 7SP
42/014	Thundridge	Land south of North Drive	North Drive	High Cross	SG11 1AD
42/017	Thundridge	Land south of The Rectory	North Drive	High Cross	SG11 1AR
42/030	Thundridge	Land south of Cold Christmas Lane	Cold Christmas Lane	Thundridge	SG12 0UG
42/032	Thundridge	Land adjacent to Oaklands	Pest House Lane	High Cross	SG11 1BG
42/033	Thundridge	Land west of Cambridge Road	Cambridge Road	Thundridge	SG12 0RA
42/034	Thundridge	Land north of North Drive (west of A10)	North Drive	High Cross	SG11 1AU
42/035	Thundridge	Land adjacent to Thundridge House	Poles Lane	Thundridge	SG12 0SQ
43/002	Walkern	Land to the north east of Stevenage, Boxbury Farm & Chells Farm	Boxbury Farm	Walkern	SG2 7AA

SLAA REF	PARISH	SITE NAME	ADDRESS	SETTLEMENT	LOCAL POSTCODE
43/003	Walkern	Chells Field (land south of Stevenage Road & east of Gresley Way)	Gresley Way	Stevenage	SG2 7NN
43/004	Walkern	Land to the rear of the White Lion PH	Winters Lane	Walkern	SG2 7PA
43/005	Walkern	Land to rear of 6-7 Clay End Road	Clay End Road	Clay End	SG2 7JB
43/006	Walkern	Land to the east of Clay End Road	Clay End Road	Clay End	SG2 7JB
43/007	Walkern	Land to rear of 5 Clay End Road	Clay End Road	Clay End	SG2 7JB
43/008	Walkern	Land adjacent to 1 Clay End Road	Clay End Road	Clay End	SG2 7JB
43/009	Walkern	Land to the rear of 19-39 Aubries	Aubries	Walkern	SG2 7NJ
43/010	Walkern	Land adjacent to Granary Cottage	High Street	Walkern	SG2 7PA
43/011	Walkern	Land north of Manor View	High Street	Walkern	SG2 7PA
44/001	Wareside	Land north of Ware		Ware	SG12 7RX
44/002	Wareside	Appleton Farmyard	Babbs Green	Wareside	SG12 7RX
44/003	Wareside	Land south of St Georges Cottages	Babbs Green	Wareside	SG12 7RU

SLAA REF	PARISH	SITE NAME	ADDRESS	SETTLEMENT	LOCAL POSTCODE
44/004	Wareside	Land adjacent to Appleton Farm	Babbs Green	Wareside	SG12 7SU
44/005	Wareside	Land to the north & east of Ware		Ware	SG12 7HL
44/006	Wareside	Land west of Great Cozens	Fanhams Hall Road	Ware	SG12 7PU
45/001	Watton-at-Stone	Watton-at-Stone Depot	Station Road	Watton-at-Stone	SG14 3SH
45/002	Watton-at-Stone	Land and buildings at Perrywood Lane	Perrywood Lane	Watton-at-Stone	SG14 3RB
45/003	Watton-at-Stone	Land at 22 Great Innings North	Great Innings North	Watton-at-Stone	SG14 3TD
45/004	Watton-at-Stone	Land north of 25 Walkern Road	Walkern Road	Watton-at-Stone	SG14 3ST
45/007	Watton-at-Stone	Land north of Great Innings North	Great Innings North	Watton-at-Stone	SG14 3TR
45/009	Watton-at-Stone	The Allotments	Church Walk	Watton-at-Stone	
46/001	Westmill	Land south of Cherry Green Lane (between Pantiles & Gaynors Farm)	Cherry Green Lane	Westmill	SG9 9LE
47/001	Widford	Adams Farm	Hunsdon Road	Widford	SG12 8SG
47/002	Widford	Land to rear of Adams Farm	Hunsdon Road	Widford	SG12 8SG
47/011	Widford	Martletts	Hunsdon Road	Widford	

EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 25 AUGUST 2016

REPORT BY LEADER OF THE COUNCIL

FINAL VILLAGE HIERARCHY STUDY AUGUST 2016

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

The purpose of this report is:

- To present to Members the Final Village Hierarchy Study August 2016.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:
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(A)	the Final Village Hierarchy Study August 2016, be supported as part of the evidence base to inform and support the East Herts District Plan; and
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1.0 Background

1.1 Members will recall that Stage 1 of the Village Hierarchy Study was presented to the District Planning Executive Panel on the 10th September 2015. The Stage 1 study ranked the villages of East Herts in terms of their sustainability by assessing access to service and facilities and public transport provision.

1.2 A further Interim Village Hierarchy Study was then presented to the District Planning Executive Panel on the 17th December 2015, with a decision on its final content deferred until further consultation with relevant Parish Councils had taken place between 5th and 29th January 2016.

1.3 A copy of the Final Village Hierarchy Study August 2016 is contained in **Essential Reference Paper 'B'**.

2.0 Report

2.1 The Final Village Hierarchy Study August 2016 uses the same methodology as set out in Stage 1 of the Study and takes into account further information received during the Interim Village Hierarchy consultation. The Final Village Hierarchy Study also considers information received from Parishes throughout 2016 and reflects the most up-to-date position.

2.2 Villages identified as Group 1 and Group 2 villages in the Draft District Plan and Category 1 and Category 2 villages from the East Herts Local Plan Second Review (where these differed) were assessed alongside a number of other larger villages that were identified as Group 3/Category 3 in the respective plans. A total of 44 villages were assessed.

2.3 The study concludes that eight villages should be categorised as Group 1 Villages in the District Plan These are the largest and most sustainable villages in East Herts.

- Braughing
- Hertford Heath
- Hunsdon
- Much Hadham
- Standon and Puckeridge
- Stanstead Abbots and St. Margarets
- Walkern
- Watton-at-Stone

2.4 A further 29 villages should be categorised as Group 2 villages in the District Plan. Whilst these villages share some similarities with Group 1 villages they do not have the same quantity or range of services and facilities and therefore score fewer points overall.

- Anstey
- Aston
- Bayford
- Benington
- Birch Green
- Bramfield
- Brickendon
- Colliers End
- Cottered

- Dane End
- Datchworth
- Furneux Pelham
- Great Amwell
- Great Hormead
- Hadham Ford
- Hare Street
- Hertingfordbury
- High Cross
- High Wych
- Little Berkhamsted
- Little Hadham
- Spellbrook
- Stapleford
- Tewin
- Thundridge and Wadesmill
- Tonwell
- Wareside
- Westmill
- Widford

2.5 Finally, the following five villages were deemed to have not scored sufficient points to be classified as Group 1 or 2 villages and should therefore be categorised as Group 3 villages in the emerging District Plan.

- Albury
- Ardeley
- Brent Pelham
- Cole Green
- Letty Green

2.6 These village groupings will now be taken forward to inform the village development strategy within the emerging 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

- Village Hierarchy Study, Stage 1: August 2015.
(<http://www.eastherts.gov.uk/index.jsp?articleid=31938>)
- Interim Village Hierarchy Study: December 2015.
(<http://www.eastherts.gov.uk/index.jsp?articleid=31938>)

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ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives:	Priority 1 – Improve the health and wellbeing of our communities Priority 2 – Enhance the quality of people's lives Priority 3 – Enable a flourishing local economy
Consultation:	The draft methodology (September 2015) was subject to a period of consultation with Ward Members and Town and Parish councils (6 th July - 3 rd August 2015).
Legal:	None
Financial:	None
Human Resource:	None
Risk Management:	None
Health and wellbeing – issues and impacts:	The 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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Final Village Hierarchy Study August 2016

1. Introduction

- 1.1 The Council is currently preparing its District Plan to help shape a sustainable future for East Herts. This will replace the current 2007 Local Plan Second Review and sets out the spatial planning strategy and policy framework for the District up to 2033. The Council is developing an evidence base to support and inform the preparation of the District Plan.
- 1.2 This paper is the concluding report on The Village Hierarchy Study; it builds on the sustainability work presented in the Village Hierarchy Study: Stage 1 (August 2015) and the methodology used in the Interim Village Hierarchy Study (December 2015). The Final Village Hierarchy Study provides a snapshot in time of both facilities and accessibility to services within the different villages of East Herts to establish their overall level of sustainability.
- 1.3 This study presents the final 'sustainability scores' associated with each village and indicates which villages will be classified as Group 1 and Group 2 villages. This study does not set out the strategy for development across the rural settlements; this will be considered through the Villages Appraisal and presented as part of the updated District Plan.

2. Villages Considered in the Study

- 2.1 East Herts is a rural district, consisting of five market towns and over 100 villages. It would not be appropriate to assess all of the settlements within the District as part of this study.
- 2.2 Villages identified as Group 1 and Group 2 villages in the Draft District Plan¹ and Category 1 and Category 2 villages from the East Herts Local Plan Second Review² (where these differed) were assessed alongside a number of other villages that were identified as Group 3/Category 3 in the respective plans.
- 2.3 The remaining settlements within the District were considered to be of a size where they would not provide sufficient sustainability scores and they are therefore not assessed further.
- 2.4 The 44 villages included in the assessment are listed below in Table 1:

Table 1: Villages Within Study		
Albury	Datchworth	Much Hadham
Anstey	Furneux Pelham	Puckeridge
Ardeley	Great Amwell	Spellbrook
Aston	Great Hormead	Standon
Bayford	Hadham Ford	Stanstead Abbots and St Margarets
Benington	Hare Street	Stapleford
Birch Green	Hertford Heath	Tewin
Bramfield	Hertingfordbury	Thundridge
Braughing	High Cross	Tonwell
Brent Pelham	High Wych	Wadesmill
Brickendon	Hunsdon	Walkern
Cole Green	Letty Green	Wareside
Colliers End	Little Berkhamsted	Watton-at-Stone
Cottered	Little Hadham	Westmill
Dane End		Widford

¹ Draft District Plan Villages: <http://www.eastherts.gov.uk/index.jsp?articleid=29084> – See Chapter 10 ‘Villages’,

² Local Plan Second Review: <http://www.eastherts.gov.uk/index.jsp?articleid=24645> – See Chapter 17 ‘Other Settlements - The Villages’

3. Methodology

3.1 A scoring system was formulated which was used to rank the villages with regard to their overall sustainability. There were two elements to this part of the study. The first was an assessment of the range of services and facilities that a village contains, and the second was an assessment of the village's accessibility to higher order settlements, and the level of public transport provision available.

1. Assessment of Services and Facilities

3.2 Services and facilities were selected and categorised into Primary and Secondary Services and Facilities. Those categorised as Primary Services and Facilities were deemed to be essential or for day-to-day requirements, and therefore the scoring criteria was weighted to reflect their importance.

3.3 The scoring criteria can be seen in Appendix 1. The services and facilities included within the study, as well as their descriptions, can be seen in Appendix 3. Focusing on the importance of services and facilities, and not just on the quantity of services, ensures a more accurate measure of sustainability.

2. Assessment of Accessibility and Public Transport Provision

3.4 The accessibility of villages within East Herts is affected by the levels of public transport provision available to residents. Those villages that are best served by public transport can be considered to be more accessible, and hence more sustainable, than more isolated villages.

3.5 Higher scores were awarded to railway service provision as railways are fixed transport infrastructure, which makes service provision less subject to service level fluctuations and economic circumstances. Higher scores were also awarded to bus service provision which offers peak hour services on Monday-Friday, enabling a day long visit to be made to a higher order settlement for work or educational purposes.

3.6 Appendix 2 displays the accessibility and public transport provision scoring criteria. The table is split into 3 categories; general accessibility, bus provision and railway provision. Appendix 4 contains a further description of each transport and accessibility type.

4. Consultation

- 4.1 As noted at previous District Planning Executive Panel meetings and East Herts Association of Parish and Town Council meetings, the villages and their services and facilities can change over time. The Council has encouraged parishes to identify where changes to services and facilities have occurred during the preparation of The Village Hierarchy Study in order to maintain its overall accuracy. Many parishes have been helpful in doing so throughout the process and have provided useful comments and suggested amendments during the consultation opportunities.
- 4.2 Parish Councillors and Ward Members were consulted between the 6th July and 3rd August 2015 on their respective village profiles. Parish Councils of the Group 3 villages added to the assessment were consulted between 5th and 29th January 2016.
- 4.3 The methodology itself was amended (after Stage 1) to reflect a better picture of what parishes considered key sustainability indicators, particularly regarding accessibility and public transport provision. We have also received a number of updates to sustainability scores since the Interim Village Hierarchy was presented and the final scoring reflects this.

5. Scoring Results

- 5.1 Table 2 presents the final scores of the (see 5.2 below) villages that were assessed against the sustainability criteria. The villages with higher sustainability scores are at the top and those with lower scores, and therefore deemed less sustainable, are at the bottom. See Appendix 5 for a full matrix on individual village sustainability scores.
- 5.2 The final results only display 42 villages as the villages of Standon and Puckeridge as well as Thundridge and Wadesmill have been combined. Village proximity and service distribution means that they function as one settlement rather than separate villages.

Table 2: Village Scores			
Stanstead Abbots and St. Margarets	126	Tonwell	31
Watton-at-Stone	88	Benington	30
Standon and Puckeridge	80	Hare Street	28
Much Hadham	58	Hertingfordbury	27
Braughing	55	Bayford	26
Hunsdon	50	Little Hadham	26
Walkern	50	Birch Green	24
Hertford Heath	50	Furneux Pelham	23
Datchworth	45	Wareside	23
Great Amwell	44	Brickendon	22
Thundridge and Wadesmill	44	Great Hormead	21
Tewin	41	Colliers End	20
Dane End	40	Cottered	19
Aston	38	Little Berkhamsted	19
High Wych	38	Anstey	17
Spellbrook	38	Bramfield	17
High Cross	37	Albury	14
Stapleford	36	Ardeley	14
Hadham Ford	33	Cole Green	11
Widford	33	Brent Pelham	9
Westmill	32	Letty Green	5

6. Conclusion

- 6.1 The sustainability scores have resulted in three distinct groupings of villages. Eight Group 1 Villages (Table 3) were identified and are considered to be the most sustainable villages in East Herts.

Table 3: Group 1 Villages			
Stanstead Abbots and St. Margarets	126	Braughing	55
Watton-at-Stone	88	Hunsdon	50
Standon and Puckeridge	80	Walkern	50
Much Hadham	58	Hertford Heath	50

- 6.2 29 Group 2 Villages (Table 4) were identified which share some similarities with the Group 1 Villages but do not have the same quantity or range of services and facilities and therefore score fewer points overall.

Table 4: Group 2 Villages			
Datchworth	45	Hare Street	28
Great Amwell	44	Hertingfordbury	27
Thundridge and Wadesmill	44	Bayford	26
Tewin	41	Little Hadham	26
Dane End	40	Birch Green	24
Aston	38	Furneux Pelham	23
High Wych	38	Wareside	23
Spellbrook	38	Brickendon	22
High Cross	37	Great Hormead	21
Stapleford	36	Colliers End	20
Hadham Ford	33	Cottered	19
Widford	33	Little Berkhamsted	19
Westmill	32	Anstey	17
Tonwell	31	Bramfield	17
Benington	30		

6.3 Five villages (Table 5) resulted in very low sustainability scores and were therefore not identified as either Group 1 or 2 Villages. These villages share more similarities with Group 3 Villages and will be categorised as such in the District Plan.

Table 5: Group 3	
Albury	14
Cole Green	14
Ardeley	11
Brent Pelham	9
Letty Green	5

6.4 These village groupings will now be taken forward to inform the village development strategy within the District Plan.

Appendix 1

In order for a service or facility to count towards a village's total, it must be within a 750m radius of the built-up area; this represents a 10 minute walking distance. A point (or more where applicable) is awarded for each service, e.g. if there were four A1 shops within a village, 4 points would be awarded etc. Appendix 1 contains a description of each facility and service included within the study.

Facility Type	Facility	Number of Points for each Facility (all within settlement)
Primary Facilities	Post Office Facility	1pt – Part-time
	Doctor's Surgery Facility	2pts – Full-time
	Primary School	2 pts
	Community Building	1pt each
	Convenience Shop	
	Children's Play Area	
Public Playing Field		
Secondary Facilities	Dentist	1pt – Part-time 2pts – Full-time
	Café/Restaurant/Take-away	1pt each
	Place of Worship	
	Public House	
	Other A1 Shop	
	Pre-school/Nursery	
	Pharmacy/Chemist	
	Private Recreational Facilities	
	Allotments	
	Petrol Station	

Facility Type	Additional Weighting (basic number multiplied by)
All Primary	x3
All Secondary	Remains the same

Appendix 2:

Transport Type	Indicator	Scoring Criteria
General Accessibility	Proximity to nearest Service Town ³ (in miles)	0.0 – 2.0 = 8pts 2.1 – 3.0 = 6pts 3.1 – 4.0 = 4pts 4.1 + = 2pts
Bus Service Provision	No. of Daily Returns (Mon-Fri)	1 – 4 = 2pts 5 – 9 = 4pts 10 – 14 = 6pts 15 – 19 = 8pts 20 + = 10pts
	No. of Daily Returns (Sat)	1 – 4 = 1pt 5 – 9 = 2pts 10 – 14 = 3pts 15 – 19 = 4pts 20 + = 5pts
	Sunday Service (Any time/number)	2pts
	Bus Service suitable for commute ⁴	5pts
Railway Service Provision	Railway Station within Village	10pts

³ All distances measured in miles, from centre of village to centre of service town. Centre refers to centre of development/built up area in both cases; not perceived centre of village/town.

⁴ Bus service arriving in Service Town before 9am and departing after 5pm (includes the 5 market towns within East Herts in addition to Harlow, Stevenage and Welwyn Garden City)

Appendix 3:

Facility Type	Facility	Reason for Inclusion/Criteria
Primary Facilities	Post Office	<p>Post offices have traditionally provided a valuable service to rural areas allowing access to a wide range of services. Especially important to the elderly who may not be able to easily travel outside the settlement and/or may not have access to internet services.</p> <ul style="list-style-type: none"> - Includes independent Post Offices, part-time Post Offices and Post Offices within a shop.
	Doctor Surgery	<p>Access to a doctor is important to provide for the on-going health needs of residents.</p> <ul style="list-style-type: none"> - Includes both permanent surgeries and part-time surgeries.
	Primary School	<p>Reduces the need for children and parents to travel long distances.</p> <ul style="list-style-type: none"> - Does not include privately funded schools. - Or schools which only cater for a select type of student, (e.g. Students with learning difficulties) as this does not directly serve local need.
	Community Building	<p>Provides a location for community activities and events.</p> <ul style="list-style-type: none"> - Indoor hall or larger building, most often used for community events but can also be privately hired.
	Convenience Shop	<p>A general convenience store with a range of food and general goods is seen as a basic requirement and important in determining the sustainability of a settlement. Convenience stores will provide a daily 'top-up' shop of essentials, thus reducing the need to travel.</p>
	Children's Play Area	<p>Designated area for children to play in. Might include climbing frames of varying materials and/or an area of softer flooring.</p>
	Public Playing Field ⁵	<p>Provides green space or recreational facilities for public use.</p> <ul style="list-style-type: none"> - Playing fields, nature reserves, equipped play areas, tennis courts, and sports pitches with

⁵ In some cases Public and Private Recreational Facilities overlap, every effort has been made to separate and count individually; however in some cases the provision of the facility may be large enough that it is counted both as a Public facility and as (below) a Private facility.

		<p>changing rooms etc.</p> <ul style="list-style-type: none"> - Facilities that can be accessed by the community, without having membership to a privately run organisation. - In some cases these facilities can be publically accessible but may require a charge. - Includes both indoor and outdoor facilities.
Secondary Facilities	Dentist	<p>Dentists are an important healthcare facility.</p> <ul style="list-style-type: none"> - Includes both permanent and part-time surgeries.
	Café/Restaurant/Take-away	<p>Provide residents with a choice of food outlets as well as providing employment opportunities.</p> <ul style="list-style-type: none"> - In some cases Café/Restaurant is deemed to offer separate service despite being within same unit as shop/pub, therefore has been added to the assessment.
	Place of Worship	<p>Plays an important role in community cohesion.</p>
	Public House	<p>Can often be the heart of a local community. In smaller, more isolated settlements pubs may be able to diversify and provide other essential services.</p>
	Other A1 Shop	<p>A variety of shops and retail which again lower the need to travel outside of the village, they differ from other shops by providing comparison goods and some services.</p> <ul style="list-style-type: none"> - Includes any shop within the A1 use-class.
	Pre-school/Nursery	<p>Local childcare can be particularly important for working families.</p> <ul style="list-style-type: none"> - Assessment includes both private childcare facilities as well as nurseries and Pre-school associated with schools.
	Pharmacy/Chemist	<p>Access to a dispensary prevents journeys outside that some may find difficult and is important to the on-going health needs of the residents.</p> <ul style="list-style-type: none"> - Includes both pharmacy and dispensary.
	Private Recreational Facilities	<p>Provides access for club members to facilities such as a bowling green, cricket pitches, football pitches, tennis courts, changing rooms etc.</p> <ul style="list-style-type: none"> - Facilities either not normally accessible to the public or where a membership fee is required.

	Allotments	- Provide a timeless service that still remains very popular in villages within East-Herts.
	Petrol Station/Garage	Can offer a valuable choice to residents and provide local employment opportunities. Petrol stations will typically provide a range of comparison and convenience goods as well.

Appendix 4:

Accessibility/Transport Type	Accessibility Criteria	Reason for Inclusion/Criteria
General Accessibility	Proximity to nearest Service Town ⁶	Being within close proximity to a service town enhances the sustainability of a location. It shortens the travel time to employment, schooling and services that a rural community may not be able to provide.
Bus	No. of Daily Returns (Mon-Fri)	Where a settlement has a more frequent bus service, it can be considered more sustainable as they provide residents with a higher level of accessibility to urban areas.
	No. of Daily Returns (Sat)	For residents working during weekdays, a frequent Saturday bus service can provide residents with access to urban areas on the weekends, outside of working hours.
	Sunday Service (Anytime/Number)	An additional service, often symbolic of a more substantial bus service throughout the week.
	Bus Service suitable for commute	A bus service that runs from Monday to Friday and arrives within a town before 9am and has a return service from the town after 5pm provides opportunity to commute to work, this is more sustainable than driving.
Train	Train Station within Village	Faster alternative to bus service also provides access to a broader transport network. As with all train lines in East Herts the service feeds into London, an important commuter service.

⁶ In this case, the term *service town* refers to the 5 towns within East Herts (Bishops Stortford, Buntingford, Hertford, Sawbridgeworth and Ware) as well as the towns of Harlow, Stevenage and Welwyn G.C. outside of East Herts.

	Facilities																Facility Total	Accessibility						Accessibility Total	Total
	Primary Facilities						Secondary Facilities											Proximity to Nearest Service Town	No. of Daily Returns (Mon-Fri)	No. of Daily Returns (Sat)	Sunday Service (anytime/number)	Bus Service Suitable for Commute	Railway Station within Village		
	Post Office Facility	Doctor's Surgery Facility	Primary School	Community Building	Convenience Shop	Children's Play Area	Public Recreation Area	Dentist	Café/Restaurant/Take-away	Place of Worship	Public House	Other A1 Shop	Pre-school/Nursery	Pharmacy/Chemist	Private Recreational Facilities	Allotments									
Albury	0	0	6	3	0	0	0	0	0	1	0	0	0	0	0	0	10	2	2	0	0	0	0	4	14
Anstey	0	0	6	3	0	0	0	0	0	2	1	0	1	0	0	0	13	2	2	0	0	0	0	4	17
Ardeley	0	0	6	0	0	3	0	0	1	1	1	0	0	0	0	0	12	2	0	0	0	0	0	2	14
Aston	0	0	6	9	0	3	6	0	0	1	1	0	1	0	3	1	31	4	2	1	0	0	0	7	38
Bayford	0	0	6	3	0	3	3	0	0	1	1	0	1	0	1	0	19	4	2	1	0	0	0	7	26
Benington	0	0	6	3	0	0	3	0	0	1	2	1	1	0	0	0	17	2	4	2	0	5	0	13	30
Birch Green	0	0	6	3	0	3	3	0	0	0	0	0	2	0	0	0	17	4	2	1	0	0	0	7	24
Bramfield	0	0	0	3	0	3	3	0	0	1	1	0	0	0	0	0	11	4	2	0	0	0	0	6	17
Braughing	6	0	6	9	3	3	3	0	0	2	3	0	1	0	1	1	38	4	6	2	0	5	0	17	55
Brent Pelham	0	0	0	3	0	0	0	0	0	1	1	0	0	0	0	0	5	2	2	0	0	0	0	4	9
Brickendon	0	0	0	3	0	3	6	0	0	1	1	0	0	0	1	0	15	4	2	1	0	0	0	7	22
Cole Green	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	2	4	4	1	0	0	0	9	11
Colliers End	0	0	0	3	0	0	0	0	0	1	1	0	0	0	0	0	5	2	6	2	0	5	0	15	20
Cottered	0	0	0	3	0	0	3	0	0	1	1	0	0	0	0	0	8	6	4	1	0	0	0	11	19
Dane End	6	0	6	3	3	3	3	0	0	1	1	0	1	0	0	1	28	2	4	1	0	5	0	12	40
Datchworth	3	0	6	6	3	9	6	0	1	1	2	0	1	0	2	1	41	2	2	0	0	0	0	4	45
Furneux Pelham	3	0	6	3	0	0	0	0	0	1	1	0	0	0	1	1	16	2	4	1	0	0	0	7	23
Great Amwell	0	0	6	3	0	0	0	0	1	1	1	1	1	0	0	0	14	8	10	5	2	5	0	30	44
Great Hormead	0	0	6	3	0	0	0	0	0	1	1	0	0	0	0	1	12	6	2	1	0	0	0	9	21
Hare Street	0	0	0	0	0	3	3	0	2	0	1	0	0	0	0	0	9	6	6	2	0	5	0	19	28
Hadham Ford	3	3	0	3	0	6	3	0	0	0	1	0	0	0	0	0	19	4	4	1	0	5	0	14	33
Hertford Heath	0	0	6	3	6	3	3	0	0	1	3	0	1	0	1	1	28	8	6	3	0	5	0	22	50
Hertingfordbury	0	0	0	3	0	0	3	0	0	1	1	0	0	0	0	1	9	8	4	1	0	5	0	18	27
High Cross	0	0	6	3	3	0	0	0	0	1	1	0	1	0	0	0	16	6	8	2	0	5	0	21	37
High Wych	3	0	6	3	3	3	3	0	1	1	1	0	1	0	1	1	27	8	2	1	0	0	0	11	38
Hunsdon	6	3	6	3	3	3	3	0	0	1	2	0	1	0	1	1	34	2	8	1	0	5	0	16	50
Letty Green	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	2	2	0	0	0	0	4	5
Little Berkhamsted	0	0	0	3	3	3	3	0	0	1	1	0	0	0	0	0	14	2	2	1	0	0	0	5	19
Little Hadham	0	0	6	0	0	0	0	0	0	1	0	0	0	0	0	0	7	4	8	2	0	5	0	19	26
Much Hadham	6	6	6	6	3	3	3	2	1	2	1	0	2	1	2	1	45	2	4	2	0	5	0	13	58
Spellbrook	0	0	6	0	0	0	0	0	0	0	1	0	1	0	0	0	8	8	10	5	2	5	0	30	38
Standon and Puckeridge	6	6	12	6	9	3	3	0	2	3	4	2	3	1	0	1	62	2	8	3	0	5	0	18	80
Stanstead Abbotts and St Margarets	6	6	6	12	12	12	3	2	5	2	3	12	4	1	3	1	90	6	10	5	0	5	10	36	126
Stapleford	0	0	6	3	0	3	3	0	1	1	1	0	1	0	0	0	19	4	6	2	0	5	0	17	36
Stewin	3	0	6	6	3	3	3	0	1	1	2	0	2	0	2	1	33	6	2	0	0	0	0	8	41
Thundridge and Tradesmill	0	0	6	3	3	3	3	0	0	1	3	0	1	0	1	1	25	6	6	2	0	5	0	19	44

Pinwell	0	0	6	3	0	0	3	0	0	0	1	0	1	0	0	0	0	14	6	4	2	0	5	0	17	31
Falkern	6	3	6	3	3	3	3	0	1	2	2	2	1	0	0	1	1	37	2	4	2	0	5	0	13	50
Wareside	0	0	6	3	0	0	3	0	0	1	2	0	0	0	0	0	0	15	6	2	0	0	0	0	8	23
Stanton-at-Stone	6	6	6	12	6	6	3	2	1	2	2	4	2	1	3	1	0	63	2	6	2	0	5	10	25	88
Westmill	0	0	0	3	0	3	3	0	1	1	1	0	1	0	0	1	0	14	8	4	1	0	5	0	18	32
Widford	0	0	6	3	0	3	3	0	0	1	1	0	1	0	1	1	0	20	2	4	2	0	5	0	13	33

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 25 AUGUST 2016

REPORT BY THE LEADER OF THE COUNCIL

DUTY TO CO-OPERATE UPDATE REPORT

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report presents the notes of the latest Member-level meetings with adjoining local authorities

<u>RECOMMENDATION FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:

(A)	the notes of the Member-level meetings held with neighbouring local authorities be noted.
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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 throughout the plan-making process in order to address strategic cross boundary issues.

1.2 It was agreed that the notes of all Member-level meetings would be reported to District Planning Executive Panel.

2.0 Report

2.1 The Co-operation for Sustainable Development Board (known as the Co-op Board) was established in 2014 in order to facilitate strategic level co-operation between the following authorities: East Herts, Broxbourne, Harlow, Epping Forest, Uttlesford, Chelmsford, Redbridge, Enfield, Waltham Forest and Hertfordshire and Essex

County Councils. The Terms of Reference for this group were presented to Panel on 8th December 2014.

2.3 This report presents the minutes from three meetings of the Co-op Board. Notes of further meetings will be presented to future Panel meetings as required.

2.4 Prior to submission of the District Plan to the Planning Inspectorate in March 2017, it is expected that a series of Memoranda of Understanding (MoU's) will be agreed with neighbouring local authorities, and other bodies where considered appropriate. The MoU's will identify how strategic cross boundary issues have been addressed. A number of authorities across the country have had their Local Plans found 'unsound' at Examination in recent months on the basis that they have not adequately demonstrated that they have met the requirements of the duty. The MoU's referred to above will therefore form a key piece of evidence in support of the District Plan moving forward to Examination.

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, 8th December 2014)

All reports may be accessed at:

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

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ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives:	Priority 1 – Improve the health and wellbeing of our communities Priority 2 – Enhance the quality of people's lives Priority 3 – Enable a flourishing local economy
Consultation:	None
Legal:	None
Financial:	None
Human Resource:	None
Risk Management:	None
Health and wellbeing – issues and impacts:	The Pre-Submission 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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Essential Reference Paper B

Co-operation for Sustainable Development Member Board 7 March 2016, 6:30pm, (Civic Centre, Harlow)

Attendance

Members	Officers	Representing
Cllr Richard Bassett (Chair) Cllr Chris Whitbread Cllr John Philip	Derek Macnab Alison Blom-Cooper Sarah King	Epping Forest DC
Cllr Susan Barker	Andrew Taylor Richard Fox	Uttlesford DC
Cllr Kay Twitchen	David Sprunt Zhanine Smith	Essex CC
Cllr Linda Haysey Cllr Robert Brunton	Liz Watts Claire Sime	East Herts DC
Cllr Tony Durcan Cllr Danny Purton	Paul MacBride Graeme Bloomer	Harlow DC
Cllr Jim Metcalfe Cllr Paul Seeby	Martin Paine	Broxbourne BC
Cllr Derrick Ashley	Paul Donovan	Herts CC
	John McGill	London Stansted Cambridge Consortium (LSCC)
	Steve Smith	AECOM
	Rob Smith	Advisory Team for Large Applications (ATLAS)

*** Actions in bold**

1. Apologies received

Councillor Helen Coomb, and Paul Walker – LB Redbridge

2. Draft notes of previous meeting (4th December 2015) – including review of action points

Agreed subject to correction of a typo in the attendance list – Liz Watts (not West)

3. Strategic OAN Options – report on process, timetable and options for testing (presentation by Steve Smith)

Steve Smith gave a presentation on draft spatial options for testing the delivery of housing across the Housing Market Area, updating the Board on work done so far for the West Essex/East Herts (SHMA) area.

Members had a broad discussion which included the following matters:

- There were concerns that this work is very sensitive, and that of course individual authorities had further detailed work to do on individual sites etc. Steve Smith explained that the technical work AECOM are doing is 'optioneering', which will be an appendix to the Sustainability Appraisal. It is designed to enable the testing of options that the authorities can broadly agree are reasonable to test at this stage. These may change with time and require further testing, but there is a need to make progress now so that initial transport modelling on options can be started. In addition to transport modelling the options are being evaluated through Sustainability Appraisal (how do the options effect air quality, biodiversity, water etc.), deliverability appraisal (what infrastructure is necessary to deliver the different options) and Habitat Regulations Assessment (how will the different options affect Epping Forest).

- Four HMA-wide spatial options to meet the objectively assessed housing need for the SHMA, and one founded on the CLG 2012 based household projections, were proposed for testing, with different quanta of development in and around Harlow. Officers had also considered some other spatial options which were not considered reasonable for testing at this stage. All options considered would need to be well documented and included in the report on this work.
- It was acknowledged that if preliminary work came back suggesting that another option might be worth testing, then this would of course be fed back to officers and Members. This Strategic Options work will be a regular item on the Co-op. Member Board and officer group meetings.
- GRT sites – it was noted that the change in the (planning, not legal) definition of Gypsy Roma Travelers is likely to lead to a change in the way GRT sites are provided. It is thought that it may mean that some current GRTs would no longer technically qualify as ‘Gypsies’ under the new planning definition, which could mean that provision for them might need to be made via new park home sites rather than GRT sites. More detailed government guidance is needed as this definition change is only recent, and its full impacts cannot yet be known. Essex Planning Officers Association had commissioned an update of the GTAA study to take account of the new definition and the report is due shortly.

All agreed to AECOM continuing to work on the options as discussed, and to continue ongoing liaison on emerging outcomes.

Action – It was agreed that the 5 HMA wide spatial options contained in the presentation should go forward for testing. Sarah King to circulate Steve’s presentation asap [all are asked to please treat the presentation’s contents as confidential ‘work in progress’].

4. Strategic Transport – update on modelling (David Sprunt)

- ECC Transport modelling – work towards Highways England (HE) signing off on ECC’s transport model is ongoing, and nearing completion (HE officers have indicated this also). While the J7A model has to be signed off by HE, technically Local Plan models do not, although it makes sense to do so as they are using the same model and therefore clearly linked. It was queried whether the highways modelling/scheme for J7a would be signed off in time to run with the spatial options work AECOM are doing, and the Local Plan consultations which are planned by the local authorities. David noted that even if HE did not sign up to the J7a scheme in time for the consultations, the objective would be to get a Memorandum of Understanding with HE to agree to the principle of J7A.
- It was noted that the West Essex/East Herts MPs had written a joint letter to the Minister about transport issues and HE’s engagement. David Sprunt explained that a formal response had not yet been received but he had been contacted to say the letter was received. All agreed to offer HE the opportunity to send a representative to the Member and Officer Co-op. groups. Steve Smith added that it was likely that there would be early results from AECOM’s work that could be discussed with HE in April. Steve noted that it would be important to have draft MoUs for HE and Natural England to review for sign-off.
Action – Glen Chipp to invite Highways England to next Co-op. Member Board (19 April)
- Essex CC modelling / Herts CC modelling – although Essex CC’s ‘VISUM’ model is not the same as Herts CC’s ‘COMET’ model, it is possible to extract information from each and feed it into the other.
- M11 Junction 7/7A – Government has asked for consideration of schemes for £34m for Junction 7. It could be about 16-18 months before a preferred scheme for J7 is chosen. David added a preferred scheme for J7A is likely to be identified much sooner than that

but that there was no funding for this in RIS1 (Road Investment Strategy 1) for schemes up to 2020, so it would need to go into a bid for RIS2.

- Junction 8 on M11 – there was a recent meeting with the Minister on junction 8 improvements etc., and a meeting with the Dept. for Transport is planned. Bids for funding for J8 and J7A could be submitted to RIS2 (2020). Highways England intends to consider whether a larger scale intervention on J8, over and above what ECC is considering now, is necessary; that would be submitted to RIS2. Government made an announcement last week about increasing transport accessibility for major airports – details are sketchy but this should support improvements to junction 8.
- Query re how funding from sites can be levered into major transport infrastructure - Herts CC representatives noted that viability work so far suggested that the uplift in value on Greenfield sites can be large so promoters should be able to contribute to highway improvements.

5. Strategic Sites Coordinator – programme of work

Paul MacBride explained that this item was withdrawn from the agenda, as the West Essex/East Herts SHMA group is currently reviewing the relevant work-streams and how they are integrated into other work. The group hoped to add this item to the agenda for the next Co-op. Officer meeting on 19 May 2016.

6. LSCC – report from task and finish group (John McGill)

John McGill reported that the task and finish meetings are complete, and the draft vision for the front of each of the local plans, is nearly complete. John will circulate this to officers in the next few weeks, it will hopefully be agreed by early summer (and discussed at the 19th April Board meeting).

John noted the importance of Members collectively taking forward the conversation on local plans, and on having a common approach on dealing with promoters who might choose to contact them directly. John explained that he was currently looking at the list of various groups Members attend. Cllr Bassett noted the need to keep other, non-local authority bodies engaged, such as the Lee Valley Regional Park Authority and the Conservators of Epping Forest. Andrew Taylor confirmed that both those bodies are integrated into the officer LSCC and Co-op. meetings.

John McGill noted the urgency of the Crossrail timetable, and how important this significant new infrastructure will be. Crossrail 2 looks at 2060 as its horizon, so this is planning well beyond the Local Plan periods of the SHMA authorities. It is hoped that funding for Crossrail 2, including West Anglia Main Line four-tracking, will be announced in the Budget. John McGill sees the urgent challenge as presenting a realistic but ambitious plan, otherwise the Treasury may choose to funnel funding to other areas.

7. Developing Memorandum of Understanding – spatial distribution of growth/agreed approach

It was noted that the four West Essex-East Herts SHMA authorities would need to agree a MoU to demonstrate how the SHMA housing needs will be delivered in the SHMA area. This will be key to the AECOM work and will link to the LSCC work as well. Officers think that the MoU will need to include a vision for the four authority areas (this will be partly done by the LSCC task and finish), and the agreed broad distribution of growth. This can then feature in each of the four local plans, to show the Inspector(s) a consistent story. This will demonstrate that the authorities have worked together to put growth in best location possible in planning terms. Sarah King will be helping on the draft MoU and will bring it to the Co-op. Members in due course.

8. Update on Green Belt Reviews

- East Herts DC – the Green Belt Review (GBR) by Peter Brett Associates was reported to Members in September 2015. East Herts DC consulted on the methodology with

other authorities at the time of the study. The GBR tested parcels against green belt purposes in a similar way to the methodology used by other authorities' GBRs. The parcels were then scored on terms of their overall contribution and the study looked at potential areas of search for growth. Additional work is being undertaken on masterplanning for East of Welwyn Garden City and for the Gilston area.

- Epping Forest DC – stage 1 of the GBR is complete. This looked at the whole of the GB across the district in parcels, against the GB purposes. Workshops were held with neighbouring authorities to discuss cross boundary issues; this is particularly important regarding parcels which are adjacent to the boundaries with Harlow. A detailed assessment of the areas around existing settlements and areas where there is pressure for growth (where submissions have been made to the SLAA) is being undertaken as part of the stage 2 GBR by Land Use Consultants. This study will consider where GB continues to fulfil the purposes as set out in the NPPF and should remain, where there are historical anomalies that could be rationalised, and where growth would be least harmful to fulfilling the purposes of the GB. The Green Belt assessment, though important, forms only one piece of the Local Plan evidence base, and EFDC will be considering all the elements (including landscape, flood risk, heritage, transport etc.) before coming to any decisions about the most sustainable locations for development to meet identified needs. The Stage 2 study should be complete in April 2016, and will feed into the Draft Plan Preferred Approach (regulation 18) consultation.
- Harlow DC – while there is not much GB in Harlow, officers are committed to working with neighbours, especially on assessing cross-boundary parcels. Stages 1 and 2 of the GBR are complete. These assessed the entire GB in parcels, against GB purposes, and considered whether they functioned as GB or as other open space such as green wedges/fingers. Stage 3, which is considering detailed aspects of the boundaries, is ongoing.
- Uttlesford DC – there is only a very small area of GB; this is being assessed in a very similar way to that of the other authorities, involving assessment of parcels, and meeting with SHMA partners and other authorities to discuss cross boundary issues. It was noted that the Uttlesford GB functions to prevent sprawl of settlements which are mostly outside Uttlesford District e.g. Bishops Stortford, Chelmsford, Harlow and Sawbridgeworth. The GBR will be published in mid-March 2016, prior to the Uttlesford Planning Policy Working Group meeting on 23 March 2016.
- Broxbourne BC – the existing GBR was published in 2008; it was noted that the methodology was compatible with the current/recent methodologies of the four SHMA authorities. Broxbourne BC intends to carry this review forward and apply it in the context of the new Local Plan. The existing GBR identified several options for the GB in Broxbourne Borough: a) small scale changes to the boundary; b) more extensive changes; and c) long term areas of search, which consider the more complicated relationship between the Green Belt and existing settlement patterns. Broxbourne BC welcomes comments on the existing GBR through officers by Friday 15th April. It is considered fit for purpose but they would be glad to have feedback.

9. A.O.B.

- Broxbourne BC – Martin Paine highlighted that Broxbourne BC would shortly be sharing (confidentially as this is not yet public) a draft Review of Objectively Assessed Housing Need. BBC will also circulate a draft masterplan for the Brookfield Farm area (also not yet public). Please could any comments on these be submitted to Broxbourne BC by Friday 15th April.
- Uttlesford DC – Andrew Taylor explained that this would be his last Co-op. Member Board before moving on to a new position in the private sector. All those present wished him well in his new role.

10. Dates of next meetings (already booked):

- 19 April 2016 - 6.30 p.m. Harlow DC
- 6 June 2016 - 6.30 p.m. Harlow DC
- 18 July 2016 – 6.30 p.m. Harlow DC

**Co-operation for Sustainable Development Member Board
19 April 2016, 6.30pm, (Civic Centre, Harlow)**

Attendance

Members	Officers	Representing
Cllr Richard Bassett (Chair) Cllr Chris Whitbread Cllr John Philip	Glen Chipp Alison Blom-Cooper Sarah King	Epping Forest DC
Cllr Linda Haysey Cllr Robert Brunton Cllr Gary Jones	Liz Watts Kevin Steptoe Claire Sime	East Herts DC
	David Sprunt Zhanine Smith	Essex CC
Cllr Danny Purton	Graeme Bloomer Dianne Cooper	Harlow DC
Cllr Susan Barker	Richard Fox	Uttlesford DC
Cllr Jim Metcalfe	Martin Paine	Broxbourne BC
Cllr Derrick Ashley	Roger Flowerday	Herts CC
	John McGill	London Stansted Cambridge Consortium (LSCC)
	Nigel Allsopp	Highways England
	Phil Morley	Princess Alexandra Hospital

*** Actions in bold**

11. Apologies received

Essex CC - Cllr Twitchen
LB Redbridge

12. Draft notes of previous meeting (7 March 2016) – including review of action points

The draft notes were agreed as circulated. Re: action points from previous meeting, it was noted that:

- work had begun on an MoU on the strategic distribution of OAN within the West Essex/East Herts area, and a draft would be ready for discussion at the Board on 6 June 2016; and
- an invitation had been extended to the Highways Agency for this meeting (*Note: Nigel Allsop in attendance from Highways England*).

13. Presentation from Phil Morley, CEO of Princess Alexandra Hospital

Phil Morley explained that Princess Alexandra Hospital (PAH), which serves East Herts., Epping Forest, Harlow and Uttlesford Districts, as well as other areas, faces significant financial and clinical challenges.

PAH had met with Jeremy Hunt (SoS for Health) recently regarding the future of the hospital. The key Government milestones will be:

- Decision on capital support to help sustain existing site for 5 years - July 2016
- Decision on whether there is funding available for a new hospital on a new site – September 2016
- Timeline capital plan (Government to confirm whether it will decide either to refurbish, build a new hospital, or say that the existing capital is all that is available for next 20 years) – December 2016

KPMG (commissioned by NHS England) is considering the effects of the various options:

- if PAH had to close, for example would people have to go to other hospitals further away;

- could there just be a large A&E department and a large maternity unit in PAH's place; or
- should there be a new, proper district general hospital including non-urgent/elective work?

There was a general discussion which included the following questions:

- How do PAH handle patients arriving at A&E who should be going to a GP? – PAH is working with the West Essex Clinical Commissioning Group (CCG) and Harlow Council on providing more care and support at a primary level. People aged 75+ living in care homes are twice as likely to be admitted to hospital than those who live at home, so the plan is to deliver as much care as possible at home in future. Another key issue is having sufficient residential care placements for elderly patients who might otherwise have to stay in hospital, if they cannot live at home safely
- If a new hospital were decided on, what kind of site requirements would there be? The SoS does not decide on a site. The Trust think there would have to be a new site as the existing one is seriously constrained and poorly located for public transport. The LSCC has considered some options with Harlow District Council, for a 'health and social care campus' including the hospital, and primary care etc.
- How is a new site selected? PAH is seeking a joined-up approach with partners, to discuss the access, infrastructure, social care needs etc. PAH is required to submit a plan for the future of the hospital by the end of June 2016, but the government won't have taken its funding decision by then. Glen Chipp added that a workshop with joint health commissioners was being planned
- What would the ballpark cost of a new hospital build be? A health and social care campus to serve approx. 450,000 people, would cost roughly £400m, and take about 8 years to build.
- Does PAH receive developer contributions? Hospitals do not receive contributions via S106/CIL etc. in the same way as primary care does. Generally, developer contributions are only sought for primary care e.g. GP surgeries.

Members from East Herts, Epping Forest, Harlow and Uttlesford District Councils agreed to write a letter of support for PAH in seeking capital support for the next 5 years. Glen Chipp noted that there would be ongoing engagement between the four Councils, PAH and West Essex on the future of PAH and wider health provision in the area. The Councils would continue to use the Co-op. group to engage with PAH so as to ensure everyone was involved in the discussion.

Action: Sarah King to add potential for new site for PAH to the next Co-op. officer group agenda on 19 May 2016

14. Strategic Transport update from Nigel Allsop, Highways England

- ***General information on Highways England***

Nigel Allsop explained that he is the Asset Development Team Leader for Highways England Area 6 (including Essex, Norfolk & Suffolk), and that each county has two officers; those for Essex are Mark Norman and Andy Jobling. Nigel noted that his team engaged with as many groups as possible, at different levels, but that the team had a limited number of staff available.

Highways England's 'RIS1' (Road Infrastructure Strategy 1, 2015-2020) comprises funding of £15.2bn nationally, of which the eastern region has £2.1bn committed to it in 15 schemes, although some of these would be built out in the RIS2 period (2020-2025), or the RIS3 period (2025 onwards). In next few weeks HE will start consulting on the

funding programme for RIS2, building the portfolio for schemes for delivery in 2020-2025 which will be determined next year. Once the priority schemes are identified, HE will start negotiating with the treasury for funding.

- ***Sign off of the transport model***

Members noted their concerns in the delay in HE signing off the LMVR for the transport modelling Essex CC is doing, which was key to the joint work being undertaken. Nigel explained that HE is still working with Essex CC on signing off, but that HE had no fundamental issues with the model, but it needed to be looked at more carefully and needed to include caveats.

- ***Junctions 7 and 8 on the M11***

Nigel noted that improvements were planned for M11 J7 within RIS1, and also potentially for J8 in RIS2.

- ***New Junction 7A the M11***

Nigel stated that Highways England could not support the idea of J7A in principle, until the individual Local Plans and the evidence behind them provided a viable business case for J7A. He intimated that the modelling may not show a business case exists for J7A, but if there was one, then there would be a case for supporting some funding for it within RIS2.

Nigel added that the Department for Transport has a general objection to new motorway junctions, but David Sprunt added that, more recently, HE suggested that they would look more favourably on a new junction if it would facilitate economic growth.

Members were very concerned at the statement that HE would not support J7A in principle, and explained that Local Plans would not be able to pass Examination stage without the principle of J7A being supported by HE, as it was essential to unlock the level of growth required in the area. Without it, the growth would not be possible, and so the Local Plans would in all probability be found unsound.

Officers and Members felt that the situation was very frustrating as Government is exhorting local authorities to make progress on their Plans as soon as possible, and to include details of highways issues and the planned improvements to deal with them, within the Plans, along with support from HE to show deliverability. So it is a vicious circle in which the authorities cannot get Local Plans adopted. The need for highways improvements at junction 8 caused Uttlesford District Council major problems at Examination in December 2014 for this reason. All noted the need for better dialogue between HE, the Department for Transport and the Department for Communities and Local Government on these matters.

David Sprunt noted that some transport modelling work which has been completed has shown that both improvements to J7 and a new J7A are required for the level of growth being planned in the area. The modelling is clear that there is no way either J7 or J7A alone could provide for all of the growth. David added that Essex CC gave a strategic outline business case to HE several months ago but has not had comments on it. David noted that Essex CC is commissioning consultants to work on a Growth Infrastructure Framework, which can help inform HE's decision. Essex CC can update on progress at the next Co-op. Member Board.

Members asked whether, if the transport modelling showed that J7A is necessary, HE would commit to agreeing to J7A in principle in the proposed memorandum of understanding that was being prepared to support the local plans. Nigel said that if the

modelling showed that J7A is necessary, then yes HE could sign up to that MoU. Members did not feel that this was sufficient commitment, and felt that stronger assurances were needed.

• **Actions – it was agreed that:**

- **Nigel Allsop would chase a reply to the enquiry by the Essex CC Cabinet Member to the Minister;**
- **A representative from HE will attend the Co-op. Board on 6 June 2016;**
- **Co-op. Board would consider sending a joint letter from the West Essex/East Herts Leaders to the Minister and the Local Plans lead official at CLG outlining its concerns; and**
- **Epping Forest DC would circulate a copy of the information received so far on the Growth Infrastructure Framework.**
- **Co-op. Board would request a formal response from HE, agreeing to sign up to the MoU supporting the principle of J7A as long as the transport modelling shows a business case exists;**
- **Co-op. Board would contact MP/MPs on this issue; (Note: a letter was sent from the Leaders on 27 April 2016 and the following reply was received from Highways England on 5 May 2016)**

15. Strategic OAN Spatial Options – update report on progress

Alison Blom-Cooper explained that Steve Smith (AECOM) is supporting the work of the group to test the various spatial distribution options, and a fuller update will be reported to the Co-op. Member Board on 6 June 2016. It is intended that Members will agree at the Co-op. Member Board on 18 July 2016 which strategic spatial option for the distribution of growth would be taken forward by the four authorities as the framework within which their respective local plans would be prepared.

16. Update on Strategic Sites work

It was noted that the inception meeting had been held with the appointed consultants AECOM to review the strategic sites, and the work would tie in with the timetable for the Strategic OAN Spatial Options work are doing. There will be a full update on the Strategic Sites work at the Co-op. Member Board on 6 June 2016.

17. LSCC – update on vision

John McGill explained that the draft vision for the 'LSCC Core Area' (Broxbourne, East Herts, Epping Forest, Harlow and Uttlesford Councils) has been worked on by the group and considered by each local authority. It has been designed to form a consistent vision which can be included in the front of each individual Local Plan. John added that a separate marketing prospectus is being drafted which will use much of the same language as in the joint vision, but will be more specific on amount of development, in order to make the strategic case for investment for various kinds of infrastructure etc. This will help to make our case when liaising with prospective developers. He added that the announcement that TfL will provide funding for a major study on Crossrail 2 should be welcomed, as the group has made a strong case for Harlow being the terminus of Crossrail 2.

The LSCC is organising a second 'Core Area' leadership forum at the end of May/beginning of June. Depending on timing, this could be used to sign-off the prospectus and consider a commitment to a regular (6-monthly) programme of meetings. John McGill is also working on finalising the review of cross-authority groups which relate to the LCSS Core area.

The LSCC Core area Leaders confirmed their agreement with John McGill's proposals. Members suggested that the draft vision could be made more locally specific, about growth and infrastructure, explaining that the first is only viable if the second is included. Members

also suggested that the draft vision should include reference to the area being the 'Silicon Valley' of the UK. John accepted these points and will take them on board when finalising the draft.

18. Update on development of various Memoranda of Understanding (MoU)

Three draft MoUs are to be taken to the Co-op. Member Board on 6 June 2016 for discussion:

- Strategic OAN Spatial Distribution - (between West Essex/East Herts authorities, Essex CC & Herts CC) - to set out the way growth projected for the Housing Market Area and Functional Economic Market Area (effectively the West Essex/East Herts SHMA area) should be distributed. This will depend on outcomes of technical work including the Strategic OAN Spatial Options work from AECOM. The final MoU will need to set out the agreed option for distribution of growth between the four authorities in the Housing Market Area. It will also include the draft vision from the LSCC for the wider area, which is intended to be included in all four Local Plans. Sarah King at Epping Forest DC to lead on the draft of the MOU.
- Air Quality/HRA work - (between West Essex/East Herts authorities, Natural England & Conservators of Epping Forest) – to ensure that air quality issues particularly with regard to Epping Forest, are carefully assessed across the wider area, in a way that will meet Natural England's requirements. Amanda Thorn at Epping Forest DC to lead on the draft of the MOU
- Highways matters – (between West Essex/East Herts authorities, Essex CC, Herts CC & Highways England) – to set out issues and possible mitigation on highways matters. This will be informed by the results of the transport modelling, and engagement with the county councils and Highways England. It will seek to gain in principle support for a new junction 7A on the M11, giving a reasoned argument showing why it is required. David Sprunt at Essex CC to lead on the draft of the MOU.

19. A.O.B.

- Cllr Jim Metcalfe noted that this would be his last meeting, but that his successor (Cllr Paul Seeby) will continue to attend

20. Dates of next meetings (already booked):

- 6 June 2016 - 6.30 p.m. Harlow DC
- 18 July 2016 – 6.30 p.m. Harlow DC
- 12 September 2016 – 6:30pm Harlow DC

**Co-operation for Sustainable Development Member Board
6 June 2016 (Civic Centre, Harlow)**

Attendance

Members	Officers	Representing
	Phil Drane	Brentwood BC
Cllr Richard Bassett (Chair), Cllr Chris Whitbread	Derek Macnab, Alison Blom-Cooper Sarah King	Epping Forest DC
Cllr Gary Jones, Cllr Bob Brunton	Liz Watts, Kevin Steptoe, Claire Sime	East Herts DC
	David Sprunt, Zhanine Smith	Essex CC
Cllr Jon Clempner, Cllr Danny Purton	Graeme Bloomer	Harlow DC
	Nigel Allsopp Simon Amor	Highways England
Cllr Helen Coombe		LB Redbridge
Cllr Susan Barker	Richard Fox	Uttlesford DC
	Steve Smith	AECOM
	Rob Smith	ATLAS

*** Actions in bold**

21. Apologies received

Broxbourne BC – Cllr Paul Seeby, Martin Paine
 East Herts DC – Cllr Linda Haysey
 Essex CC – Cllr Kay Twitchen
 Epping Forest DC – Cllr John Philip
 Herts CC – Cllr Derrick Ashley, Paul Donovan
 Lee Valley Regional Park Authority – Stephen Wilkinson, Claire Martin

22. Charing of the Co-op. Member Board

Cllr Richard Bassett explained that he had completed his year as Chair of the Co-op. Board, and as per the Terms of Reference, a new Chair should be chosen for the year ahead. Cllr Linda Haysey had volunteered to be the new Chair. This was agreed unanimously. As Cllr Haysey was unfortunately unable to attend this meeting, Cllr Bassett chaired it in her place.

23. Draft notes of previous meeting (19 April 2016) – including review of action points

The notes were agreed as circulated.

- Sarah King to add potential for new site for Princess Alexandra Hospital (PAH) to the next Co-op. officer group agenda on 19 May 2016 - *Done, was discussed on 19 May 2016, work ongoing*
- Nigel Allsop would chase a reply to the enquiry by the Essex CC Cabinet Member to the Minister – *Noted that the Minister has now replied*
- A representative from Highways England (HE) to attend the Co-op. Board on 6 June 2016 - *Done, Nigel Allsop and Simon Amor in attendance tonight*
- Essex CC Growth Infrastructure Framework (GIF) information to be circulated – *Zhanine Smith gave a verbal update (see A.O.B.)*
- Regarding highways issues, the Co-op. Board would:
 - consider sending a joint letter to the Minister/Local Plans lead official at CLG
 - request a formal response from HE, agreeing to sign up to the MoU supporting the principle of J7A as long as the transport modelling shows a business case exists
 - contact MP/MPs on this issue

This was all followed up via a letter from the West Essex/East Herts Leaders on 27 April 2016 to Highways England - reply was received from Highways England on 5 May 2016. Also see A.O.B.

- John McGill to amend LSCC Core Area Vision as per Member comments - *Done, John McGill sent an updated draft vision which has been incorporated into the Draft Distribution of OAN MoU*

24. Update on Strategic OAN Spatial Options work & Strategic Sites work inc. Transport modelling

a. Strategic OAN Spatial Options work & Strategic Sites work

- Steve Smith (AECOM) gave a presentation on the Strategic OAN Spatial Options work. He explained that the work was progressing well and would be completed within the next couple of weeks, including identification of the 'best option' for OAN distribution
- It was noted that the title of the third MoU (Epping Forest SAC/Air Quality), was confusing, and should be renamed to make clear that it is about Habitats Regulation matters, regarding sites of European importance (e.g. Special Areas of Conservation like Epping Forest), and the cumulative impacts that more than one authority's growth could have on them. (Non-cumulative impacts and non-European sites would be dealt with at the individual Local Plan level)
- It was noted that James Riley (AECOM) who is doing the HRA work urgently needs the traffic modelling data from Essex CC transport to model air quality impacts, and cannot progress without it. Essex CC officers are chasing their consultants to prepare this data quickly. Progress with the transport modelling may need to be managed by prioritising certain runs
- The 'best option' for OAN distribution as highlighted by all of the Strategic OAN Spatial Options work will be presented to the Co-op. Member Board on 18 July 2016
- It was noted that a joint/co-ordinated press release would be needed for when the four West Essex/East Herts draft Plans go out for representations in November

b. Transport modelling.

- David Sprunt (Essex CC) gave a presentation on the interim results of the transport modelling
- The modelling results being shared were only 'initial', and that the model would have to be tweaked to produce robust outputs (as per standard practice)
- It was noted that the VISUM transport model doesn't necessarily show problems on particular junctions well, so Essex CC has a separate model for that purpose
- The modelling incorporates the assumptions of: J7 improvements, a new J7A being built, and interim improvements to junction 8. The model does not assume a full scale J8 intervention as there is no detailed scheme for a major intervention in place yet
- Essex CC need to work with HE on the timescale for a major J8 intervention, large enough to cope with proposed growth at Stansted Airport. The interim solution incorporated within the model would give enough headroom for approx. 5-10 years' growth. All noted the importance of an intervention at J8, especially as a planning application is expected imminently from Stansted Airport, so officers will need to know what developer contributions will need to be sought
- Essex CC has previously run modelling assuming no new J7A to see the effects (this showed very bad effects on the highway network), but will re-run it as part of the Strategic OAN Spatial Options modelling, to show the consequences of not having J7A
- HE representatives explained that HE is about to start the route strategy process to feed into RIS2, and there is an online tool where stakeholders can record their priorities; this would be a good way of getting J8 on the list. (Essex CC is already

responding to this). **David Sprunt to send a link to RIS2 online tool to Sarah King.**
[Note – this link was sent and has already been circulated among the Board].

25. Discussion of three draft Memoranda of Understanding

a. Distribution of OAN across West Essex/East Herts HMA

Sarah King introduced this overarching MoU, which leads on from the joint SHMA which identified the Objectively Assessed Need in the West Essex/East Herts SHMA area.

This MoU focusses on the OAN level of housing growth, the agreed best option for its spatial distribution (which we do not know yet as the Strategic OAN Spatial Options work is not quite complete), the rationale for the choice of agreed best distribution option, and arrangements for future co-operation and monitoring/delivery. It also includes appendices on governance, the roles of authorities and groups involved, the LSCC 'Core Area' vision, and summaries of technical evidence (SHMA, Strategic OAN Spatial Options work, Transport modelling etc.). Signatories to this MoU will be East Herts DC, Epping Forest DC, Harlow DC and Uttlesford DC. It will also be 'supported by' (but not signed by) Essex CC and Herts CC (as Highways authorities) and Highways England.

Sarah noted that there was an error in the draft as circulated, there is a reference on p32 referring to figures 30-34; this should read figures 16-20. This will be amended in the draft.

b. Transport infrastructure (including J7, J7A & J8)

David Sprunt (Essex CC) introduced this draft MoU, to which the signatories would be Essex CC, Herts CC, Highways England, East Herts DC, Epping Forest DC, Harlow DC and Uttlesford DC. The purpose of this MoU is to help deliver the highway infrastructure needed to support the best option of spatial distribution of the OAN. The key parts of the MoU are section 4 and the appendices, which together detail key highway issues regarding M11 J7 and 7A, M11 J8, and key local highway network improvements such as on the A414 corridor through Harlow, Second Avenue etc. It was noted that the bit on the A120 around Bishop's Stortford had been deleted in tracked changes. This was because those works already have funding allocated. However, all felt that this kind of information should still be in the MoU, but within an 'already funded' section, for clarity.

It was noted that the location of a potential new hospital (relocation of Princess Alexandra Hospital) would have an effect on traffic movement on the network, both in relation to where the new hospital could be, and whether the existing hospital site were to be used for housing etc. Essex CC has included two potential sites for a new hospital in the modelling to assess the effects.

Sustainable transport corridors will be very important in reducing the impacts of traffic on the network. Those proposed so far are a 'north-south' corridor from the Gilston area, through Harlow town centre, to the area south of Harlow; and an 'east-west' corridor along First Avenue and out to the area east of Harlow. These two corridors are thought to be deliverable. If these are to be successful they will need to be written into Local Plans and have political support. David Sprunt added that it would be important for the district councils to work with Essex CC on securing developer funding for highways improvements; this will need to continue after Local Plans are in place.

David Sprunt noted that outside of this MoU, Essex CC is working on another MoU between Essex CC and Highways England that will be more general. Claire Sime added that East Herts DC anticipate having additional MoUs on the rest of their district, as clearly the one being discussed at present is Harlow focussed.

Simon Amor noted that Highways England is committed to working with Essex CC and the West Essex/East Herts district councils to find a way forward for J7A. He acknowledged that this was difficult as the Department for Transport was asking HE to deliver J7 improvements, but J7A is not, at present, funded, so there is a need to lobby the Minister. However one of HE's strategic objectives is to facilitate economic growth, and clearly J7A will do that. HE is happy to assist in bringing forward the data showing the need for J7A.

c. Epping Forest SAC/Air Quality (particularly re: Epping Forest)

Alison Blom-Cooper explained that Amanda Thorn was leading on this draft MoU, and the Conservators of Epping Forest and Natural England are heavily involved as well.

There are two key transport matters that could cause harm to Epping Forest Special Area of Conservation (SAC). The first is how air quality could be impacted by growth in traffic (caused by growth in development). This is modelled using air quality data and transport modelling – the latter of which Essex CC have not yet been able to provide for AECOM due to work pressures. If harm cannot be completely avoided, which is unlikely, then it must be mitigated against. The second key issue is recreational pressure, from people who for example might drive into the forest and park there in order to take walks. This can also create more traffic and thus more harm to the air quality, but it is easier to mitigate against. The first, air quality harm is an HMA-wide issue, as development in another district might still lead to more people driving through Epping Forest. However, the recreational pressure issue is more local to Epping Forest DC and may be handled via an MoU between Epping Forest DC, the Conservators of Epping Forest and Natural England only.

It was agreed that all would send any comments for all three draft MoUs directly to Sarah King by 17 June 2016.

26. Expression of interest for capacity funding to DCLG in response to the Locally Led Garden Villages, Towns & Cities Prospectus – Rob Smith, ATLAS

Rob Smith explained that a new Garden Villages, Towns & Cities Prospectus was issued this year by CLG. The first section is for 'Garden Villages', meaning up to 10,000 homes. Government is seeking expressions of interest for these and is likely to select up to 12 bids by the end of July. The Homes and Communities Agency will handle the criteria and scoring. The Garden Villages section is intended to be for discrete, freestanding self-contained settlements rather than urban extensions.

The second section of the prospectus invites expressions of interest for 'Garden Towns/Cities', meaning over 10,000 homes. Government recognises that this might be in the form of transformational growth, i.e. a place with the potential for a step change in growth which would change its nature. The prospectus does not define what a garden city should be but general principles would be things like high quality green infrastructure, sustainable transport, good design, potentially including self or custom building etc. Government wants bids to be locally led and is probably only looking for a couple of schemes each year. They will be looking for long term planning, i.e. more than a Local Plan period, but also would want some tangible outcomes of growth within 5 years.

If a bid were to be successful it would provide enabling funding, e.g. for capacity support and officer time. Funding is usually given via a lump sum at the start, then a lower level retainer every year. Any funding would also come with CLG's support in brokering with other Government departments, it would likely make getting capital investment in infrastructure

much easier, and it might help get priority access to the Planning Inspectorate etc. in plan making matters.

East Herts DC, Epping Forest DC and Harlow DC officers have been drafting a bid document with ATLAS's help, seeking capacity funding from CLG, under the 'Garden Towns/Cities' section of the prospectus. If CLG awarded funding, then it could be used for e.g. a joint strategic delivery team, or dedicated resources in individual authorities, or masterplanning and infrastructure planning.

It was agreed that **Rob Smith would arrange a meeting between CLG and East Herts DC/Epping Forest DC/Harlow DC officers** to discuss the bid [*Note – this meeting took place on 1 July 2016*], in terms of the level of growth the authorities are trying to provide through their Local Plans, and what funding they would seek. Uttlesford DC officers noted that although Uttlesford DC is not currently proposed as part of the bid, they would support such a bid.

27. A.O.B.

- Highways matters – A meeting has been arranged with Transport Minister Andy Jones for 8 June 2016, at which Members and officers would stress the importance of highways infrastructure to deliver growth in the West Essex/East Herts area. They would be seeking support in principle for funding for M11 J7, the new J7A and J8. – [*Note - Meeting with Minister took place on 8 June 2016 and was thought helpful and positive, the Minister took on board everything presented*]
- Essex Growth and Infrastructure Framework (GIF) – Essex CC has commissioned AECOM to prepare this. It will not replace individual Infrastructure Development Plans. The GIF will assess the current position on education, highways, emergency services etc., then look at the infrastructure needed to meet future proposals for growth. The baseline work should be complete in June/July 2016 and the final report in Aug/Sept 2016. **Sarah King to circulate GIF presentation, and ask Essex CC to present the GIF findings at the September 2016 Co-op. Member Board.**
- Membership of the Co-op. Board - Essex County Cllr John Spence **is the new Essex CC representative on the Co-op. Board**, with Essex County Cllr Mick Page as his deputy on the Board

28. Dates of next meetings (already booked):

- 18 July 2016 – 6.30 p.m. Harlow DC
- 12 September 2016 – 6:30 pm Harlow DC

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