



**MEETING** : DISTRICT PLANNING EXECUTIVE PANEL  
**VENUE** : COUNCIL CHAMBER, WALLFIELDS, HERTFORD  
**DATE** : THURSDAY 8 SEPTEMBER 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.)

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### **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

*To approve as a correct record the Minutes of the meeting of the Panel held on 25 August 2016 (to follow).*

4. Declarations of Interests

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

5. East Herts Draft District Plan – New Draft Chapter 3 – Development Strategy (Pages 7 - 30)

6. East Herts Draft District Plan – New Draft Chapter 4 – Green Belt and Rural Area Beyond the Green Belt (Pages 31 - 42)

7. East Herts Draft District Plan – Chapter 5 – Bishop's Stortford: Response to Issues Raised During Preferred Options Consultation (Pages 43 - 102)

8. East Herts Draft District Plan – Buntingford – Settlement Appraisal and New Draft Chapter 6 (Pages 103 - 134)

9. East Herts Draft District Plan – Hertford – Settlement Appraisal and New Draft Chapter 7 (Pages 135 - 222)

10. East Herts Draft District Plan – The Gilston Area – Draft Concept Framework, Settlement Appraisal and New Draft Chapter 11 (Pages 223 - 260)

*Note – Essential Reference Paper 'D' will follow on the supplementary agenda.*



11. East Herts Draft District Plan – East of Stevenage – Settlement Appraisal and New Draft Chapter 12 (Pages 261 - 296)

12. Urgent Business

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

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## EAST HERTS COUNCIL

### DISTRICT PLANNING EXECUTIVE PANEL – 8 SEPTEMBER 2016

#### REPORT BY LEADER OF THE COUNCIL

#### EAST HERTS DRAFT DISTRICT PLAN – NEW DRAFT CHAPTER 3 – DEVELOPMENT STRATEGY

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WARD(S) AFFECTED: ALL

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

The purpose of this report is:

- To present to Members a new draft Chapter 3 (Development Strategy) for subsequent incorporation into the final draft District Plan.

<b><u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:</b>	
<b>(A)</b>	<b>the draft revised Chapter 3 (Development Strategy), 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.</b>

#### 1.0 Background

1.1 The Council published its Draft District Plan Preferred Options for consultation for a period of twelve weeks between 27<sup>th</sup> February and 22<sup>nd</sup> May 2014.

1.2 The issues raised through the consultation with regard to the Chapter 3 (Development Strategy) were considered at the District Planning Executive Panel on the 25<sup>th</sup> August 2016.

1.3 This report presents a redrafted Chapter 3. **Essential Reference Paper 'B'** contains the revised draft chapter.

## 2.0 Report

- 2.1 The purpose of Chapter 3 is to set out the Council's strategy for delivering growth in East Herts over the Plan period. In particular, it identifies the amount of new development that will be delivered, and where it should be located.
- 2.2 Members will recall that a report to this Panel on 25<sup>th</sup> August presented the issues arising from the Preferred Options consultation in relation to Chapter 3, along with proposed Officer responses. The report identified that the objectively assessed housing need figure for the District is for 16,390 new homes by the end of the Plan period. The revised chapter, with is presented in **Essential Reference Paper B**, is based on this housing requirement.
- 2.3 The Preferred Options version of the District Plan identified the Plan period as being 2011 to 2031. It is now proposed that this is extended to 2033 within the Pre-Submission version in order to provide a forward looking strategy of at least 15 years from the date of adoption, in line with national policy.
- 2.4 In addition, the report to Panel on 25<sup>th</sup> August also confirmed that the Government has recently published updated 2014 based household figures, and that Officers are working with our housing market area partners in order to understand how this new data impacts on the assessment of objectively assessed housing need. While this work is still ongoing, an initial assessment suggests that the housing need figure for the District has increased to around 19,500 homes. As work on the District Plan is now well advanced, it is not possible to identify further sites to meet this higher figure in full without causing significant delay to the plan making process. However, in order to recognise this upward trend, the revised Chapter does identify a sufficient number of sites to deliver in excess of 18,000 homes over the course of the Plan period.
- 2.5 Members are invited to agree the revised chapter as a basis for inclusion in the final District Plan, with the content being finalised when the consolidated plan is presented to this Panel on 15<sup>th</sup> 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 3 (Development Strategy) Issue Report – considered by the District Planning Executive Panel on the 25<sup>th</sup> August 2016

<http://democracy.eastherts.gov.uk/ieListDocuments.aspx?CId=151&MId=2952>

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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 revised chapter will form part of the Pre-Submission District Plan which will be consulted on in November 2016.
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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## **Chapter 3 The Development Strategy**

### **3.1 Introduction**

3.1.1 This chapter sets out the Council's strategy for delivering growth in East Herts over the Plan period up to 2033. It looks at the amount of new development that will be delivered, and where it should be located across the District. It also identifies the need for new site allocations to deliver this strategy, and what new infrastructure and services may be required.

3.1.2 The strategy seeks to deliver the vision and objectives in Chapter 2 and ensure that growth in East Herts is 'sustainable'. Sustainable development is defined as 'development which meets the needs of the present without compromising the ability of future generations to meet their own needs'. In essence it means providing growth which meets the needs of existing and future residents, while mitigating adverse economic, environmental and social impacts. The amount and location of growth is important. It is also critical to ensure that growth is accompanied by the required infrastructure and services in order to support the quality of people's lives.

3.1.3 This chapter also sets out how local people can facilitate the delivery of growth themselves, and influence their local area – through Neighbourhood Planning. The Government's localism agenda has raised the profile and importance of community involvement in planning. The Council is supportive of this approach.

### **3.2 Level of Growth**

3.2.1 This section looks at the amount of housing, employment and retail growth that the Council will seek to facilitate over the Plan period. Other types of development will also be needed in the District over the Plan period including, for example, green infrastructure and community facilities. These requirements are explored further in the relevant topic chapters (see Part 2 of the Plan) and settlement chapters.

## Housing Growth

- 3.2.2 Following the abolition of the East of England Regional Spatial Strategy in 2013, the Council is responsible for identifying a housing ‘target’ in the District Plan. The right level of housing can help to support economic growth, meet local housing needs, and facilitate the delivery of infrastructure. Having a housing target also allows a local authority to work with service providers and other organisations to ensure that suitable infrastructure is provided to meet the needs of new development.
- 3.2.3 The Council has worked closely with its housing market area partners (Harlow, Epping Forest and Uttlesford Councils) in order to prepare a technical document known as the Strategic Housing Market Assessment (SHMA). The purpose of the SHMA is to identify an ‘objective assessment of housing need’ (NPPF paragraph 47), taking into account population projections, affordable housing needs and jobs growth.
- 3.2.4 The SHMA concludes that the combined level of housing need across the four local authority areas is 46,058 homes for the period 2011 - 2033. This figure has been disaggregated amongst the four authorities. A Memorandum of Understanding (MoU) has been signed which commits all four Councils to meeting their individual housing needs within their own administrative boundaries. For East Herts, the level of need is 745 new homes per year, or 16,390 by 2033<sup>1</sup>.
- 3.2.5 In order to meet this challenging housing target, the District Plan has allocated a number of sites across East Herts. These sites are identified in Section 3.3 later in the chapter.
- 3.2.6 It is important to note that the housing need figure for the District does not include the projected increase in the number of people within residential institutions. The SHMA identifies the projected growth in population aged 75 or over living in communal establishments in the District, as 529 persons,

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<sup>1</sup> The Plan Period is 2011 – 2033 (22 years). Therefore 745 homes x 22 = 16,390.

between 2011-2033. Therefore, in addition to the overall housing target, this Plan supports a gross increase of approximately 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.

- 3.2.7 The Government released new household projections in July 2016. These figures show that, by 2033, the population of East Herts is likely to be greater than originally expected. Following the release of these figures, further work on the SHMA has shown that the level of housing need in the District has increased to around 19,500 new homes by 2033. While the Council is unable to identify sufficient sites to meet this higher target at present, the District Plan does take account of the upward trend in housing need, and therefore seeks to provide for more than 745 new homes per year.

The SHMA is available to view on the Council's website at: [www.eastherts.gov.uk/shma](http://www.eastherts.gov.uk/shma).

### **Economic Growth**

- 3.2.8 In addition to housing need, the Council has also worked with our neighbouring authorities in order to understand how many new jobs are likely to be created within the plan period. This work, which was undertaken to inform the SHMA, indicates that between 435 and 505 new jobs will be created each year in East Herts.

The SHMA Economic Evidence is available to view on the Council's website at: [www.eastherts.gov.uk/shma](http://www.eastherts.gov.uk/shma).

- 3.2.9 In order to help support jobs growth in the District, this Plan seeks to ensure sufficient provision of land and premises for office, industrial and warehousing uses (B1, B2, B8 uses) in sustainable locations which meet the needs of local

businesses. As such, 10-11 hectares of new employment land will be provided in the following locations:

- 3 hectares to the north of Buntingford Business Park;
- 4-5 hectares within the development at South of Bishop's Stortford; and
- 3 hectares within the development at North and East of Ware.

In addition, 3,000 square metres of additional B1 employment floorspace will be provided at Mead Lane, Hertford.

3.2.10 In order to recognise the valuable role existing businesses have, the following locations have also been designated as Employment Areas:

- 0.23 hectares at Millside Industrial Estate, Bishop's Stortford;
- 0.36 hectares at Southmill Trading Estate, Bishop's Stortford;
- 7.71 hectares at Pegs Lane/Hale Road, Hertford;
- 0.43 hectares at Leaside Works, Stanstead Abbots; and
- 0.59 hectares at Riverside Works, Amwell End, Stanstead Abbots.

3.2.11 In addition, all Employment Areas that were previously identified through the East Herts Local Plan 2007 have retained their designation through the District Plan. The Council encourages the provision of new employment land created through mixed-use developments, which should contain small-scale business units. These will make valuable contributions to balancing new residential developments with local employment opportunities. These employment areas may be designated through future revisions to the District Plan.

3.2.12 More detail on the approach to employment is contained in the settlement chapters and in Chapter 15 (Economic Development). Proposals that affect designated and non-designated Employment Areas will be considered in accordance with Policies ED1 (Employment) and ED2 (Rural Economy).

### **Retail Growth**

3.2.13 As the population grows additional retail development will be required to provide shopping opportunities at the local level. The Council's 'Retail and Town Centres Study Update' (2013) assesses qualitative issues and quantitative requirements for additional retail floorspace to meet future needs. The Study concludes that there will be a need over the Plan period for:

1. Convenience (food) retail – an additional 7,600m<sup>2</sup> (net) of new floorspace
2. Comparison (non-food) retail – an additional 6,100m<sup>2</sup> (net) of new floorspace

3.2.14 These floorspace requirements take into account current planning permissions, but not the potential reoccupation of vacant floorspace.

<p>The Retail and Town Centres Study Update (2013) is available to view on the Council's website at: <a href="http://www.eastherts.gov.uk/retailstudy2013">www.eastherts.gov.uk/retailstudy2013</a>.</p>
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3.2.15 The Plan seeks to ensure that new retail development occurs in a manner that secures the vitality and viability of the District's retail centres but is not too restrictive as to stifle innovation and investment. There is a need for a balanced approach to enabling retail centres to respond to changing retail behaviour, whilst preserving and enhancing the essence and historic character which is key to the attractiveness of the District's historic market towns.

- 3.2.16 More detail on the approach to retail requirements is contained in the settlement chapters and in Chapter 16 (Retail and Town Centres).
- 3.2.17 New retail provision will be encouraged within major urban extensions in order to support the new and existing communities. These will be neighbourhood centres or local parades<sup>2</sup> as appropriate and will complement the existing town centres.

### **Policy DPS1 Housing, Employment and Retail Growth**

In the period 2011 to 2033 the Council will:

- (a) Provide for a minimum of 16,390 new homes in the District up to 2033.
- (b) Maximise opportunities for jobs growth in the District, with the aim of achieving a minimum of 435 - 505 additional jobs in East Herts each year. This will include making provision for 10-11 hectares of new employment land for B1/B2/B8 uses.
- (c) Encourage an additional 7,600m<sup>2</sup> of convenience and 6,100m<sup>2</sup> of comparison retail floorspace in the District.

## **3.3 Development Strategy**

- 3.3.1 This section sets out where growth should be focused, and where it should be restricted. The aim is to ensure that growth 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. This section sets out the broad policy framework, which is then carried through into the separate settlement-level policy sections.

## **Guiding Principles and Strategy**

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<sup>2</sup> As defined within Section 15.8 of Chapter 15: Retail and Town Centres.

3.3.2 The District Plan is based on a number of guiding principles. The principles are based on national policy and legal requirements applied to the local circumstances of the East Herts area.

### **Guiding Principles**

1. To allocate sufficient sites in order to meet the full housing needs of East Herts;
2. To prioritise the development of brownfield land and other appropriate sites within the urban areas of the settlements, but to avoid over-development of such sites;
3. To promote self-containment by directing development to areas where there is reasonable proximity to services and facilities, and which reflect existing travel to work areas, school catchments, and retail spend patterns and functional geographies;
4. Wherever possible to utilise readily available features to provide clear and unambiguous Green Belt boundaries;
5. To co-operate with adjoining authorities on cross-boundary strategic matters where it is reasonable to do so;
6. To focus development in locations where the impacts on the historic and natural environment are minimised as far as possible;
7. To acknowledge that the capacity for the market towns and villages to grow is constrained by the existing capacity and future potential of these settlements, and therefore the provision of large-scale strategic development will be required, both within this Plan period and beyond;
8. To protect and enhance the rural area and the Green Belt outside the allocated development areas to maintain the countryside and the rural character of the District;
9. To encourage limited small-scale development in and around the identified villages, with an opportunity for neighbourhood planning to influence the type and location of development sites.

- 3.3.3 The strategy must have regard to a number of housing requirements set out in the National Planning Policy Framework (NPPF).
- 3.3.4 Firstly, the NPPF requires that every effort should be made to meet the housing, business and other development needs of an area. As set out above in Section 3.2, the housing need in the District is for 745 new homes each year. East Herts' projected need is back-dated to 2011 when the previous Local Plan figures ended, meaning that the total need is for 16,390 homes up to 2033.
- 3.3.5 Secondly, the NPPF requires a supply of specific deliverable sites in order to meet housing needs in the first five years of the plan period. For East Herts, the first five year period is 2017 to 2022.
- 3.3.6 In the period 2011-2017 (the 'pre-plan' period) it is anticipated that only 3,161 homes will be built, leaving a shortfall of 1,309 homes when measured against the projected need of 4,470 over 5 years<sup>3</sup>. The Plan seeks to make up this shortfall in the first five year period (2017 – 2022).
- 3.3.7 Thirdly, the NPPF also requires the provision of an additional buffer in the first five year period (moved forward from later in the plan period) to ensure choice and competition in the market for land. A 20% buffer should be applied where there is a persistent record of under-delivery. Given the significant shortfall in housing delivery since 2011, the Council accepts that a 20% buffer should be applied. Taking into account identified need, the shortfall and the 20% buffer, the total housing requirement for the first five year period is 6,041 new homes<sup>4</sup>.

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<sup>3</sup> The pre-plan period is 2011 – 2017. Therefore the level of housing need in this period is 745 homes x 6 years = 4,470 homes. Expected number of housing completions in this period is 3,161 homes. This leaves a shortfall of 1,309 homes (4,470 – 3,161).

<sup>4</sup> The first five year period is 2017 – 2022. The level of need for this period is 745 homes x 5 = 3,725 homes. 3,725 homes plus the shortfall of 1,309 homes = 5,034 homes. The 20% buffer is then added: 5,034 homes x 1.2 = 6,041 homes.



3.3.8 Policy DSP2 (The Development Strategy 2011-2033) below identifies how housing need, both within the first five year period and beyond, will be met. More detailed information about individual sites can be found in the settlement chapters.

**Policy DPS2 The Development Strategy 2011-2033**

I. Provision will be made to meet the projected housing need of at least 745 homes per year, making a total minimum requirement of 16,390 homes in the period 2011-2033.

II. In the first five years of the Plan after adoption (2017-2022), the housing requirement will total at least 6,041 homes, comprising:

(a) 3,725 based on projected housing needs for 5 years;

(b) 1,309 to address the shortfall from the period 2011-2017;

(c) 1,007 to allow a 20% buffer for choice and flexibility, brought forward from later in the plan period.

III. Brownfield locations in the towns will be prioritised for mixed-use development. The remainder of the housing and development needs in the Plan period will be met on a range of greenfield sites across the District.

IV. Development in the villages shall be delivered in accordance with local initiatives led by Parish Councils, subject to the review triggers set out in Policy VILL1 (Group 1 Villages).

3.3.9 The main policy elements of the development strategy are shown on the Key Diagram. Inset maps showing further detail on particular locations are shown in the relevant section of the Plan. The Key Diagram including the main map and inset maps is included at Appendix A.

**Housing Supply**

3.3.10 There are a number of potential sources of housing supply as follows:

1. Completions and commitments are shown in the period 2011-2017, based on monitoring data up to March 2016.
2. Within the urban areas of the towns, a limited number of sites with capacity for 10 or more homes have been identified through the Strategic Land Availability Assessment (SLAA).
3. It is also anticipated that there will be a number of permissions granted on small sites of less than 10 homes that have not currently been identified. These are known as windfalls. A windfall allowance has been made on the basis of an analysis of past windfalls.
4. The majority of new homes will be provided on sites that have been allocated within this Plan. These are shown on the Policies Map and the site locations are shown in red alongside each of the site specific policies in the settlement chapters.
5. Finally, in addition to providing new homes within the Plan period, the Gilston Area will provide a further 6,950 new homes after 2033 while North and East of Ware will also provide a further 500 homes subject to the identification of suitable highways mitigation measures.

3.3.11 Policy DPS3 (Housing Supply 2011-2033) reflects these different sources of housing supply. It also sets out the contribution from each source for the important first five year period after adoption (2017-2022).

3.3.12 The identified housing supply to 2033 exceeds the requirement by 1,650 homes<sup>5</sup>. This serves two functions. Firstly, it provides a contingency to allow for flexibility. Contingency planning is necessary to allow for eventualities beyond the Council's control, including the economic cycle and factors relating to specific sites or developers, which could result in stalled sites.

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<sup>5</sup> The housing need for the Plan period (2011 – 2033), is 16,390 homes. The District Plan identifies sufficient sites to deliver 18,040 new homes. Therefore 18,040 minus 16,390 = 1,650 homes.

The Plan provides a range of sites in different locations which means that it is not reliant on delivery at a single location. A full breakdown of the housing supply is included at Appendix B.

3.3.13 Secondly, as identified within paragraph 3.2.5, the Council recognises that recent household projections demonstrate a further upward trend in housing need. While this Plan is not able to identify sufficient sites to meet these additional needs in full, providing a level of housing that is significantly in excess of 745 homes per year demonstrates the Councils commitment to positive planning. The positive approach is further enforced by a commitment to bring forward a significant amount of new housing beyond the Plan period.

**Green Belt**

3.3.14 Green Belt land is a valued resource for many residents in East Herts. However, the challenging level of housing need in the District cannot be met in a sustainable way without undertaking a carefully planned review of the Green Belt in certain locations. Therefore approximately 6% of the District’s Green Belt has been removed in order to help meet a significant proportion of the housing need, both within this Plan period and beyond.

**Policy DPS3 Housing Supply 2011-2033**

The overall housing supply will meet projected housing need over the plan period 2011 to 2033.

Supply Source	Housing supply: First five years 2017-2022	Housing supply: Total 2011-2033
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Windfall allowance	250	800
Completions	0	2,625
Commitments	1,899	2,435
Villages	300	500
Deliverable sites in existing urban areas as identified by Strategic Land Availability Assessment	88	88
Bishop's Stortford Goods Yard	250	400
Land at Old River Lane, Bishop's Stortford	0	100
Hadham Road Reserve Secondary School Site, Bishop's Stortford	0	163
Bishop's Stortford High School Site, London Road	150	150
North of Bishop's Stortford	800	2,529
South of Bishop's Stortford	250	750
Bishop's Stortford – East of Manor Links	50	50
Hertford - Mead Lane Area	100	200
North of Hertford	50	150
South of Hertford	50	50
West of Hertford	550	550

Sawbridgeworth – North of West Road	125	125
Sawbridgeworth – South of West Road	175	175
North of Sawbridgeworth	0	200
North and East of Ware	0	1,000 (1)
East of Stevenage	600	600
Gilston Area	0	3,050 (2)
East of Welwyn Garden City	210	1,350
TOTAL	5,897	18,040

(1) With a further 500 homes beyond 2033, subject to suitable mitigation.

(2) With a further 6,950 homes beyond 2033.

### **Infrastructure Planning**

3.3.15 When development occurs, it places additional demands on infrastructure, including water and energy supply, wastewater disposal, roads, education and healthcare as well as open space, and green infrastructure. Therefore it is important to ensure that appropriate levels of infrastructure are provided to support growth and meet the objectives of the District Plan.

3.3.16 The Council plays an important role in coordinating a range of agencies and bodies which deliver infrastructure in East Herts, in order to ensure delivery alongside housing growth. Infrastructure providers include Hertfordshire County Council (including transport and education), NHS England and the Clinical Care Commissioning Group (healthcare), utility companies, as well as the Council itself.

- 3.3.17 The planning system can be used in a number of other ways, including securing the provision of infrastructure or contributions towards infrastructure from developers. The District Plan also assists by protecting existing facilities against loss.
- 3.3.18 Policy DPS4 (Infrastructure Requirements) identifies the key infrastructure requirements that are likely to be needed over the plan period to support the levels of growth envisaged in Policy DPS2 (The Development Strategy 2011-2033). This list has been informed by discussions with key infrastructure providers. The list is not exhaustive and does not include site-specific infrastructure which may be required in connection with individual development sites to mitigate their impact.
- 3.3.19 A full list of infrastructure schemes can be found in the Infrastructure Delivery Plan (IDP), which also provides information on costs, funding and phasing. The IDP will be reviewed on a regular basis in order to monitor the implementation of infrastructure schemes and identify where interventions might be required.

The Infrastructure Delivery Plan can be viewed on the Council's website at: [www.eastherts.gov.uk/idp](http://www.eastherts.gov.uk/idp)

- 3.3.20 The Council will work closely with infrastructure providers to ensure inclusion of infrastructure schemes within their programmes, plans and strategies, and delivery of specific infrastructure requirements in conjunction with individual development schemes and the expected timing of development coming forward.

#### **Policy DPS4 Infrastructure Requirements**

I. Infrastructure needed to support development must be phased appropriately with the delivery of residential and other development to ensure that capacity is provided and impacts are satisfactorily mitigated in a timely manner.

II. The following strategic infrastructure will be required to support the development identified in East Herts and the wider housing market area:

- (a) a new Junction 7a on the M11;
- (b) upgrades to Junction 7 and 8 of the M11;
- (c) widening of the existing River Stort crossing, and provision of a second crossing;
- (d) improvements to the A414 through Hertford;
- (e) the Little Hadham bypass;
- (f) upgrades to the A602;
- (g) upgrades to the rail network;
- (h) new schools and the expansion of existing schools;
- (i) healthcare facilities;
- (j) broadband telecoms; and
- (k) upgrades to waste water and water supply networks.

III. The Council will use planning obligations with landowners and developers to secure direct provision or financial contributions towards infrastructure necessary to support the District Plan, including both on-site and off-site provision to address the cumulative impacts of development on strategic infrastructure.

3.3.21 Strategic infrastructure is defined as infrastructure which meets more than site-specific needs and supports the overall level and pattern of growth outlined in the Development Strategy. Site specific infrastructure serves just the needs of the occupiers and visitors to the site that it is located in. The site-specific policies in the settlement sections within this Plan contain both strategic and site-specific infrastructure.

### **3.4 Review of the District Plan**

- 3.4.1 As noted in paragraph 3.2.7, the Government has recently published updated 2014 household projections. As a result, the level of objectively assessed needs across the housing market area has increased to 54,600 homes by 2033. For East Herts, this equates to around 19,500 homes.
- 3.4.2 Given the upward trend in housing needs across the housing market area, and the fact that the Council is unable to identify sufficient sites to meet this higher housing target at present, an early review of the District Plan will be undertaken following adoption.

#### **Policy DPS5 Review of the District Plan**

Following adoption of the District Plan, the Council will undertake an early review in order to seek to meet the additional housing needs arising from the 2014 household projections.

### **3.5 Neighbourhood Planning**

- 3.5.1 Neighbourhood Planning is a new right for communities introduced through the Localism Act 2011. Communities can shape development in their areas through the production of Neighbourhood Development Plans, Neighbourhood Development Orders and Community Right to Build Orders.
- 3.5.2 Once approved, Neighbourhood Development Plans will become part of the Development Plan and the policies contained within them will be used, together with the District Plan, in the determination of planning applications. A Neighbourhood Development Plan can set out a vision for an area and planning policies for the use and development of land. Any Neighbourhood Plan prepared will need to support the strategic development needs of the District as set out in this Plan. However it will be able to shape and influence where development in the local area will go and what it will look like.

Further information on Neighbourhood Plan can be found on the Council's website at: [www.eastherts.gov.uk/neighbourhoodplanning](http://www.eastherts.gov.uk/neighbourhoodplanning)



- 3.5.3 A Neighbourhood Development Order can grant planning permission for specified developments in a neighbourhood area. Once established there would be no need for anyone to apply to the Council for planning permission if it is for the type of development covered by the order. This should make it easier and quicker for such development to go ahead in the future.
- 3.5.4 A Neighbourhood Development Order must still be in line with national planning policy, with the strategic vision for the wider area set by the local planning authority, and any other legal requirements.
- 3.5.5 Community Right to Build Orders are a new way for communities to choose for themselves where and when to build homes, shops, facilities and businesses – putting power back into the hands of local people.
- 3.5.6 Community Right to Build is an enabling right supporting local people to undertake community led development (communities collectively owning, developing and/or managing their own land and developments).
- 3.5.7 As an alternative to the traditional application for planning permission, it gives communities the power to decide for themselves what happens in their neighbourhood i.e. local people will be able to decide what their community needs. The benefits of any development, such as any profits generated, should be managed by a community organisation on behalf of the whole community.

### **Policy DPS6 Neighbourhood Planning**

The Council will support in principle development brought forward through Neighbourhood Development Plans, Neighbourhood Development Orders and Community Right to Build Orders, where such development is in general conformity with the strategic objectives and policies set out in this District Plan.

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## EAST HERTS COUNCIL

### DISTRICT PLANNING EXECUTIVE PANEL – 8 SEPTEMBER 2016

#### REPORT BY LEADER OF THE COUNCIL

#### EAST HERTS DRAFT DISTRICT PLAN – NEW DRAFT CHAPTER 4 – GREEN BELT AND RURAL AREA BEYOND THE GREEN BELT

WARD(S) AFFECTED: ALL

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

The purpose of this report is:

- To present to Members a new draft Chapter 4 (Green Belt and Rural Area Beyond the Green Belt) for subsequent incorporation into the final draft District Plan.

<b><u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:</b>	
<b>(A)</b>	<b>the draft revised Chapter 4 (Green Belt and Rural Area Beyond the Green Belt), 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.</b>

#### 1.0 Background

1.1 The Council published its Draft District Plan Preferred Options for consultation for a period of twelve weeks between 27<sup>th</sup> February and 22<sup>nd</sup> May 2014.

1.2 The issues raised through the consultation with regard to the Chapter 4 Green Belt and Rural Area Beyond the Green Belt were considered at the District Planning Executive Panel on the 25<sup>th</sup> August 2016.

1.3 This report presents a redrafted Chapter 4 which has been updated to take account of the issues raised through the

## Preferred Options Consultation.

- 1.4 **Essential Reference Paper ‘B’** contains the revised draft chapter.
- 2.0 Report
- 2.1 Chapter 4 has been rewritten to ensure consistency with the National Planning Policy Framework (NPPF). In particular, a new section on exceptional circumstances has been included. The NPPF states that Green Belt boundaries can only be amended in exceptional circumstances, through the preparation or review of a Local Plan (paragraph 83). However, there is no definition in the NPPF of what constitutes exceptional circumstances, as this will vary for each locality.
- 2.2 In East Herts there is a combination of factors that exist locally that together constitute the exceptional circumstances that require the Council to amend its Green Belt boundaries. This includes the high level of housing need, including affordable homes, exacerbated by a significant backlog of unmet need, and the lack of suitable alternative locations to the north of the District.
- 2.3 Chapter 3 (The Development Strategy) of the District Plan therefore sets out that the challenging level of housing need cannot be met in a sustainable way without undertaking a carefully planned review of the Green Belt. As such approximately 6% of the District’s Green Belt has been removed in order to help meet a significant proportion of the housing need, both within this Plan period and beyond. The revised Green Belt boundary will be shown on the Policies Map.
- 2.4 Other amendments to the chapter include the revision of Policy GBR1 (Green Belt) to refer specifically to the provisions of the NPPF rather than seeking to replicate paragraphs 89 and 90 of the Framework.
- 2.5 A new section on Neighbourhood Planning has also been added to the chapter. Hertford Heath, Stanstead Abbots & St Margarets, and Watton-at-Stone are identified as Group 1 Villages. As these villages are considered to be sustainable locations for development, these villages will be encouraged to consider whether it is appropriate to amend their Green Belt boundary through the formulation of a Neighbourhood Plan, to accommodate additional development especially where it

contributes to wider sustainability objectives and the delivery of community benefits.

- 2.6 Policy GBR2 (Rural Area Beyond the Green Belt) has been updated to ensure consistent referencing to other policies in the Plan.
- 2.7 The Draft District Plan Preferred Options version included a section on Major Developed Sites. This section has been deleted in its entirety as it sought to go beyond the requirements of the NPPF. If the Council receives an application for the limited infilling or the partial or complete redevelopment of a site that was previously identified as a Major Developed Site this will now be considered in accordance with provisions of Policy GBR1 and Policy GBR2.
- 2.8 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 4 (Green Belt and Rural Area Beyond the Green Belt) Issue Report – considered by the District Planning Executive Panel on the 25<sup>th</sup> August 2016

<http://democracy.eastherts.gov.uk/ieListDocuments.aspx?CId=151&MId=2952>

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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 <sup>th</sup> February and 22 <sup>nd</sup> 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 4 Green Belt and Rural Area Beyond the Green Belt**

### **4.1 Green Belt**

4.1.1 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

4.1.2 The National Planning Policy Framework (NPPF, paragraph 80) sets out the five main purposes of the Green Belt:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

### **4.2 Local Context**

4.2.1 Hertfordshire County Council first designated the south of the County as Green Belt as part of the Hertfordshire County Development Plan, published in 1951 and approved by the Minister of Housing and Local Government in December 1958, under the Town and Country Planning Act 1947.

4.2.2 The extent of the Green Belt in East Herts was originally limited to a small area south of Hertford and Ware. However the 1979 County Structure Plan extended the area of Green Belt northwards along the A1 to Stevenage and beyond, and along the M11 to the southern limits of Bishop's Stortford.

4.2.3 The 1986 County Structure Plan Review included the extension of the Green Belt to surround Bishop's Stortford, with the inner Green Belt boundaries being defined through the East Herts Local Plan Review, adopted in 1993.

4.2.4 The broad extent of the Green Belt was carried forward in the 2007 East Herts Local Plan and as such contains the settlements of Bishop's Stortford, Hertford, Sawbridgeworth and Ware, together with several villages.

### **4.3 Exceptional Circumstances**

4.3.1 The NPPF states that Green Belt boundaries can only be amended in exceptional circumstances, through the preparation or review of a Local Plan (paragraph 83). There is no definition in the NPPF of what constitutes exceptional circumstances, as this will vary for each locality.

4.3.2 In East Herts there is a combination of factors that exist locally that together constitute the exceptional circumstances that require the Council to amend its Green Belt boundaries. This includes the high level of housing need, including affordable homes, exacerbated by a significant backlog of unmet need, and the lack of suitable alternative locations to the north of the District.

4.3.3 Chapter 3 (The Development Strategy) therefore sets out that the challenging level of housing need cannot be met in a sustainable way without undertaking a carefully planned review of the Green Belt. As such approximately 6% of the District's Green Belt has been removed in order to help meet a significant proportion of the housing need, both within this Plan period and beyond. The revised Green Belt boundary is shown on the Policies Map.

### **4.4 Planning Applications in the Green Belt**

4.4.1 When considering any planning application for development, local planning authorities should ensure that substantial weight is given

to any harm to the Green Belt. Inappropriate development in the Green Belt is by definition harmful and should not be approved except in 'very special circumstances'. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

4.4.2 There are however some uses that are appropriate in the Green Belt and these are listed in paragraphs 89 and 90 of the NPPF.

## **4.5 Neighbourhood Planning**

4.5.1 Hertford Heath, Stanstead Abbots & St Margarets, and Watton-at-Stone are identified as Group 1 Villages (see Chapter 10 Villages). These villages are inset from the Green Belt and therefore development beyond the existing built up area of the village can only come forward by amendment of the Green Belt boundary (other than the exceptions listed in paragraphs 89 and 90 of the NPPF).

4.5.2 As these villages are considered to be sustainable locations for development, these villages will be encouraged to consider whether it is appropriate to amend their Green Belt boundary through the formulation of a Neighbourhood Plan, to accommodate additional development especially where it contributes to wider sustainability objectives and the delivery of community benefits.

### **Policy GBR1 Green Belt**

I. Planning applications within the Green Belt, as defined on the Policies Map, will be considered in line with the provisions of the National Planning Policy Framework.

II. The villages of Hertford Heath, Stanstead Abbots & St Margarets, and Watton-at-Stone will be encouraged to consider whether it is appropriate to amend their Green Belt boundary through the formulation of a Neighbourhood Plan to accommodate additional development especially

where it contributes to wider sustainability objectives and the delivery of community benefits.

#### **4.6 Rural Area Beyond the Green Belt**

4.6.1 The Rural Area Beyond the Green Belt covers approximately the northern two-thirds of the District and contains the settlement of Buntingford, together with a number of villages. East Herts has a long tradition of seeking to restrain development within the Rural Area Beyond the Green Belt. This has ensured the protection of the smaller rural settlements in the District, as well as the wider area of countryside.

4.6.2 In order to continue to preserve the special character of the District's rural area, and to direct development towards the most sustainable locations, it is considered appropriate that a policy of restraint should continue in this location.

#### **4.7 Planning Applications in the Rural Area Beyond the Green Belt**

4.7.1 When considering planning applications in the Rural Area Beyond the Green Belt development will only be permitted where there is no material harm to the character or amenity of the environment.

#### **Policy GBR2 Rural Area Beyond the Green Belt**

I. Within the Rural Area Beyond the Green Belt, as defined on the Policies Map, the construction of new buildings will be considered inappropriate. Exceptions to this include:

(a) buildings for agriculture and forestry;

(b) the provision of appropriate facilities for outdoor sport, outdoor recreation, including equine development in accordance with CFLR6 (Equine Development), and for cemeteries;

(c) extensions and alterations to dwellings, residential outbuildings or extensions to existing outbuildings, and works within residential curtilages

provided that development does not result in an unacceptable impact on the rural character and appearance of the site and its surroundings;

(d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;

(e) limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact than the existing development on the rural character and appearance of the site and its surroundings;

(f) rural exception housing in accordance with Policy HOU4 (Rural Exception Affordable Housing Sites);

(g) the provision of accommodation for Gypsies and Travellers and Travelling Showpeople in accordance with Policy HOU9 (Gypsies and Travellers and Travelling Showpeople);

(h) development identified in an adopted Neighbourhood Plan.

II. Certain other forms of development are also not inappropriate in the Rural Area Beyond Green Belt. These are:

(a) mineral extraction;

(b) engineering operations;

(c) local transport infrastructure which can demonstrate a requirement for a location in the Rural Area Beyond the Green Belt;

(d) the re-use of buildings provided that the buildings are of permanent and substantial construction in accordance with Policy ED2 (Rural Economy); and

(e) development brought forward under a Community Right to Build Order in accordance with Policy DPS6 (Neighbourhood Planning).

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## EAST HERTS COUNCIL

### DISTRICT PLANNING EXECUTIVE PANEL – 8 SEPTEMBER 2016

#### REPORT BY LEADER OF THE COUNCIL

#### EAST HERTS DRAFT DISTRICT PLAN – CHAPTER 5 – BISHOP'S STORTFORD: RESPONSE TO ISSUES RAISED DURING PREFERRED OPTIONS CONSULTATION

WARD(S) AFFECTED: ALL

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#### **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 5 (Bishop's Stortford) of the Draft District Plan Preferred Options version, together with Officer responses to those issues.

<b><u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:</b>	
<b>(A)</b>	<b>the issues raised in respect of Chapter 5 (Bishop's Stortford) of the Draft District Plan Preferred Options, as detailed at Essential Reference Paper 'B' to this report, be received and considered; and</b>
<b>(B)</b>	<b>the Officer response to the issues referred to in (A) above, as detailed in Essential Reference Paper 'B' to this report, be agreed.</b>

#### 1.0 Background

1.1 The Council published its Draft District Plan Preferred Options for consultation for a period of twelve weeks between 27<sup>th</sup> February and 22<sup>nd</sup> 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 Bishop's Stortford at **Essential Reference Paper 'B'**.
- 2.0 Report
- 2.1 The Issue Report 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 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 in the majority of cases 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 15<sup>th</sup> September, along with the relevant Settlement Appraisal.
- 2.4 The responses to the issues raised identify that, in the view of Officers, amendments should be made to proposed housing allocations in Bishop's Stortford.
- 2.5 Firstly, it is the view of Officers that the quantum of development proposed for the site to the south of East of Manor Links should be reduced from 150 homes to 50 based on land availability.



- 2.6 Secondly, it is also the view of Officers that land at Bishop's Stortford South should be allocated for 750 homes to secure the delivery of new primary and secondary schools, to provide community facilities and a new business park providing local job opportunities. Should the Bishop's Stortford High School wish to relocate to the new development, provision is made for new homes on the current school site, which will facilitate the expansion of Thorley Hill Primary School.
- 2.7 The full consideration of development proposals for the town are considered in more detail in the Settlement Appraisal for Bishop's Stortford, which will be presented to Members alongside a revised District Plan chapter at the District Planning Executive Panel meeting on 15<sup>th</sup> September.
- 2.8 Members are invited to agree the Issue Report, as detailed in **Essential Reference Paper 'B'**, as a basis for informing the Settlement Appraisal and redrafted chapter on Bishop's Stortford.
- 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 <sup>th</sup> February and 22 <sup>nd</sup> May 2014.
Legal:	None
Financial:	None
Human Resource:	None
Risk Management:	None
Health and wellbeing – issues and impacts:	The Draft District Plan in general will have positive impacts on health and wellbeing through a range of policy approaches that seek to create sustainable communities.

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Issue Number	Issues raised through consultation	Officer Response
<b>General</b>		
5.1	Infrastructure is not sufficient to support the proposed development. Issues cited over education, rail, cycling, retail, health, and other social and community facilities. Road congestion is the greatest area of concern, with healthcare a close second.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Delivery Study by Peter Brett Associates has provided further evidence in relation to infrastructure requirements. Further work has been undertaken with infrastructure and service providers and this has been drawn together into an Infrastructure Delivery Plan which will be a 'live document' updated over time. All developments will be required to provide infrastructure to support the needs arising from the development, existing deficits are acknowledged and in some instances it may be possible to address these through new development.</p>
5.2	Opportunities should be taken to improve cycle networks through the town and connecting to wider Sustrans routes. The town needs to be more bike-friendly.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Where improvements can be made to the cycling network through development this will be required. This is normally achieved through on-site provision of routes or connections, or through planning obligations towards off-site improvements which are implemented as part of wider transport improvement programmes managed by Hertfordshire County Council.</p>
5.3	Development should be located outside the Green Belt, not on the edges of Bishop's Stortford. Loss of Green Belt on the edges of the town will lead to coalescence and loss of countryside. Development should be focussed on brownfield sites.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Locating development beyond the Green Belt has been explored fully but would result in unsustainable patterns of development and/or development which would not be deliverable in the short or medium term. Development on the edges of the town to the north and east will not cause coalescence with any settlements. To the south, development will be located adjacent to the properties on the west side of Thorley Street, originally a hamlet within the dispersed village of Thorley. Given the relationship between the urban edge and countryside, it is acknowledged that development on the edges of settlements will encroach into the countryside, however, all the proposed sites are within clearly defined physical boundaries formed by the primary road network, and will not compromise the wider open countryside beyond the bypass road for the town. Designated areas (SSSIs, local Wildlife Sites etc.) will be protected and where possible, enhanced. One of the guiding principles set out in the Development Strategy Chapter is to look to brownfield or previously developed sites primarily. However, there are insufficient brownfield sites to meet the District's objectively assessed needs and the Plan would therefore be contrary to the NPPF if only these sites were brought forward. All the available and deliverable brownfield sites have been addressed in formulation of the plan.</p>
5.4	Bishop's Stortford will receive the majority of the planned growth. Growth should be distributed more evenly amongst other settlements. Why despite a projected need of over 3,200 homes Hertford will	<p><b>No amendment to Plan in response to this issue</b></p> <p>The demographic projections indicate how the housing would be apportioned in the absence of any planning constraints. Careful assessment of all the options has demonstrated that constraints restrict the ability of</p>

Issue Number	Issues raised through consultation	Officer Response
	receive only 1,000, and why Ware is only earmarked for 330 houses, with only 1,800 at the Broad Location? Villages should take more development. Unfair that Hertford has received less development than Bishop's Stortford over the years. The current plan perpetuates that trend.	<p>some settlements to grow – indeed this also applies to Bishop's Stortford.</p> <p>A policy decision has been made to restrict development in the villages, given their important role in the overall rural character of the District. Local Plans are required by the NPPF to direct development to the most sustainable locations. Development in Hertford is constrained by the capacity of the A414 and other physical and environmental constraints but will accommodate 950 homes on allocated sites. Development of up to 1,500 homes is planned to the north and east of Ware (1,000 within the Plan period). Bishop's Stortford North was previously identified in the 1999 Local Plan Review, was re-appraised in the 2007 Plan and was brought forward through a Council decision to bring forward land for housing in the absence of an adequate supply at the time. In addition to the 2,529 at Bishop's Stortford North plus the associated 250 homes at the Hadham Road Reserve Secondary School Site, the District Plan allocates 1,450 homes for the town.</p>
5.5	Following this level of growth, the town will have reached its limit.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The bypass and the M11 act as obvious physical constraints inhibiting further outward growth around the town. Intensification can occur through windfall developments. Issues of future capacity and growth would be considered through future planning policy work.</p>
5.6	Proposed housing number is not robust and is not based on evidence. Do not accept the demographic projections as a true reflection of need in the area. Question the basis of the methodology.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The methodology for setting housing targets is prescribed by national policy, guidance, and practice. A Strategic Housing Market Assessment (SHMA) has been prepared to supplement the figures in the demographic projections using a methodology that is widely accepted and has been approved by the Planning Inspectorate.</p>
5.7	A south-east bypass should be completed to alleviate traffic through the town.	<p><b>No amendment to Plan in response to this issue</b></p> <p>A bypass would divert some traffic movements from the town, but may actually draw in a greater volume of traffic from the strategic road network on to the bypass. The cost of a bypass in this area would be considerable given the environmental constraints of the railway line, the river Stort and its floodplain and designated wildlife assets including the Thorley Wash SSSI. Furthermore, it would be complicated because of the intervening land is in multiple landownerships. On 22 April 2015 the issue was discussed at a meeting with representatives of Uttlesford Council, which is Local Planning Authority for much of the route of any such road (meeting note available at <a href="http://www.eastherts.gov.uk/dtc">www.eastherts.gov.uk/dtc</a>). Both Councils agreed that it is not realistic to expect this to be delivered within the Plan period. It is understood that while the south-eastern bypass is included in the long list of the County Council's 2050 Transport Vision which sets out a list of highway and transport related projects identified by the County Council for further consideration, there is no evidence that this infrastructure would be delivered within the Plan period.</p>

Issue Number	Issues raised through consultation	Officer Response
5.8	The town imports demands for services from neighbouring settlements and districts, particularly for health care and education. Services cannot cope with existing demands.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Agreed, the town has a valuable role to play not just for the rural settlements around the town in East Herts, but also for Uttlesford settlements and others within Essex county. This is a role that would be expected for a town of its size, regardless of any administrative boundaries. These matters will be addressed through ongoing Duty to Co-operate discussions with Uttlesford District Council and Essex County Council.</p>
5.9	Housing is not for local people.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Market housing provision operates on a free market basis – failure to provide sufficient homes will increase competition for homes, restricting supply and availability for those who are able to provide for their own housing needs. Affordable (subsidised) housing is provided to people on waiting lists maintained by East Herts Council and in accordance with agreed and accepted criteria.</p>
5.10	Development in the town contradicts the District Plan objectives.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Plan objectives seek to direct development to the most sustainable locations. Edge of town locations in close proximity to services and infrastructure are more deliverable than locations remote from such facilities.</p>
5.11	The south east is congested and national government should create plans to encourage the growth in regions which are more able to accept development.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Local Plans are examined against the National Planning Policy Framework (NPPF). If the Government changes the NPPF then Local Plans will reflect such changes. At present there is no indication that the government intends to change the NPPF along these lines.</p>
5.12	Proposals in the town should consider the impacts on neighbouring settlements such as Stansted Mountfitchet and Birchanger.	<p><b>No amendment to Plan in response to this issue</b></p> <p>These settlements rely on services provided within Bishop's Stortford, particularly for education and healthcare. This has been taken into account through discussions with service providers.</p>
5.13	Criticise emphasis on the five-year housing land supply.	<p><b>No amendment to Plan in response to this issue</b></p> <p>This is a requirement of the National Planning Policy Framework. To ignore this requirement would be liable to render the Plan unsound and expose the District to challenges through the planning appeals system.</p>
5.14	Housing should be built using sustainable design features.	<p><b>No amendment to Plan in response to this issue</b></p> <p>This forms part of the Design and Landscape, Climate Change and Water chapters of the District Plan.</p>
5.15	Hertfordshire County Council states that options for highway improvements need to be investigated and outline mitigation measures developed. The identified options will need to be modelled and if effective, costed with funding sources and timelines identified.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Agreed. Based on the submission by the County Council as Transport and Highways Authority, and using a jointly agreed methodology, the District Council has undertaken additional work to identify, test, and cost mitigation measures. The findings of this work are set out in the Delivery Study Transport Report.</p>

Issue Number	Issues raised through consultation	Officer Response
5.16	<p>Hertfordshire County Council commented on the Hockerill junction, stating that past studies have shown that there are no appropriate solutions to the congestion issues at the Hockerill Junction. The limit on capacity is likely to constrain future demand and make the route less attractive for through traffic. This will encourage use of the A1184/A120 ring road, which is more appropriate for these movements.</p> <p>However, the proposed development allocations will, as a minimum require improvements to the A120/A1250/A1184 roundabout and A120/B1383 roundabout. Traffic volumes are predicted to be nearing the link road capacity particularly on the approach to Birchanger and M11 junctions in Essex.</p>	<p><b>No amendment to Plan in response to this issue</b></p> <p>These points have been addressed through the Delivery Study Transport Report. More recent modelling has since taken place which will indicate where mitigation should be provided. This will be used to inform the Infrastructure Delivery Plan and detailed negotiations on development proposals.</p>
5.17	Control immigration and reduce the amount of housing.	<p><b>No amendment to Plan in response to this issue</b></p> <p>This is a matter for national policy making and is beyond the scope of planning policy.</p>
5.18	English Heritage recommends a wider town characterisation study and specific design policies in order to retain the town's distinctiveness.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Council has prepared a Conversation Area Character Statement for Bishop's Stortford. The Council has also commissioned a Town Centre Planning Framework study which looks at issues of design and character and will be used to inform planning decisions in due course.</p>
5.19	Essex County Council states that it is working closely with Hertfordshire County Council to ensure that there are enough school places across Bishop's Stortford for children attending from across the Bishop's Stortford/Stansted area to meet increased demand.	<p><b>No amendment to Plan in response to this issue</b></p> <p>This process is supported. East Herts Council will continue to work with both County Councils in relation to this issue.</p>
5.20	Essex County Council considers that the proposed growth at Bishop's Stortford North will exceed the capacity of the existing M11 Junction 8. Further consideration will need to be given to additional capacity enhancements.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Since the Preferred Options consultation, further work has been undertaken to understand the capacity of junction 8, and a programme of works has been planned to make improvements to the junction. However, it is also understood that these improvements will not meet the full mitigation of the growth within the M11 and A120 corridors, which impact on the junction (including planned growth within Uttlesford District and at Stansted Airport). East Herts Council is therefore working closely with Essex County Council and Highways England to ensure that longer term improvements to the junction remain a priority. The relevant authorities</p>



Issue Number	Issues raised through consultation	Officer Response
		are in the process of completing a Memorandum of Understanding to this effect.
5.21	Trustees of Mrs N Streeter object to the omission of two sites, one of 3.4 ha east of the B1383 London Road/Thorley Street, and the other of 0.74ha 120 metres to the south.	<p><b>No amendment to Plan in response to this issue</b></p> <p>These sites have been assessed through the Strategic Land Availability Assessment (SLAA). Site 01/158 lies to the east of London Road/Thorley Street at the junction of Whittington Way. This site is considered in the SLAA to be deliverable subject to a change to the Green Belt. Site 41/007 is not considered suitable for development in the SLAA. It is not proposed to amend the Green Belt boundary to the east of Thorley Street/London Road. Properties on the eastern side of Thorley Street are well spread out, with large plots, allowing views through to the countryside beyond. This contributes to the more rural character of this side of Thorley Street. While, the railway line could be viewed as an alternative Green Belt boundary, the railway line lies on low ground rather than on an embankment and is screened by mature scrubland. The railway line blends in to the Stort valley environment and visually does not perform a strong boundary.</p>
5.22	The Bishop's Stortford Civic Federation objects to the proposed level of development, citing the closure or relocation of a number of services and facilities in the town, including the closure of the Herts and Essex Hospital, the job centre, and the District Council offices.	<p><b>No amendment to Plan in response to this issue</b></p> <p>All providers of public services are being challenged to ensure that they are being provided in the most efficient and effective manner and in a way that best meets needs. This has led to rationalisation of service provision in many towns. However the town retains a wide range of services and facilities compared with other towns in the District and beyond. The Herts and Essex Hospital retains key functions. The strategic development sites planned for the town will be required to make provision for new community facilities to serve the needs arising from the development, which will be beneficial to the town as a whole. The District Council has not closed its office in Bishop's Stortford; residents are still able to access key services either on a drop in or appointment basis.</p>
5.23	The Bishop's Stortford Civic Federation also object to the level of growth on the grounds of insufficient built infrastructure such as roads, citing a lack of adequate east-west road connections, a mediaeval street network and lack of local road enhancements.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Part of the Town Centre Planning Framework for the town is considering the ways in which traffic circulation can be improved to alleviate some of the associated congestion arising from modern travel expectations constrained by a mediaeval street setting. HCC is considering a number of strategic sustainable transport options as part of its emerging 2050 Transport Vision. The Environment, Planning and Transport Cabinet Panel on 8th March 2016 considered a report 'Transport Vision – Post Stakeholder Engagement Report and Project Update' which included a long-list of schemes to be evaluated prior to public consultation later in the year. One of these schemes involved further improvements to the A120 in addition to the Little Hadham bypass. Future improvements to the road networks in the town will need to focus on encouraging a shift away from the use of private vehicles on to alternative means of transport, including through improvements to pedestrian and cycle networks.</p>

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5.24	The Bishop's Stortford Civic Federation state that increases in population have not been supported by an increase in jobs. The town is a commuter town with disconnected suburbs with poorly connected bus routes.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Improved efficiencies in many industries have meant that even while businesses grow this does not always translate into new jobs. This is beyond the role of planning policy. The emerging District Plan seeks to create new employment opportunities through new employment land allocations. The town benefits from being within the London-Stansted-Cambridge Corridor, where there is a lot of positivity around the creation of new business and job opportunities. Given the town's location and connections to major employment areas such as Stansted Airport, Cambridge, Harlow and London, there will always be a high level of commuting out of the town, though interestingly, there is also a high level of commuting in to Bishop's Stortford as well.</p>
5.25	The role of the town as a commuter town to serve London and Cambridge should be acknowledged.	<p><b>No amendment to Plan in response to this issue</b></p> <p>This role is acknowledged. The town benefits from being within the London-Stansted-Cambridge Corridor, where there is a lot of positivity around the creation of new business and job opportunities. Given these connections, there will always be a high level of commuting out of the town, though interestingly, there is also a high level of commuting in to Bishop's Stortford as well.</p>
5.26	Concerns about the validity of the consultation exercise.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Preferred Options consultation exercise was carried out in accordance with the comprehensive Consultation Strategy agreed by Members and also with the national regulations. All reasonable measures were taken at the time to address gaps in delivery of the promotional leaflet, and this was endorsed by the Council's external auditor.</p>
5.27	Concern that no consideration has been given to the cumulative impact of development in Hertfordshire and West Essex. Including the growth of Stansted Airport	<p><b>No amendment to Plan in response to this issue</b></p> <p>East Herts is part of a group known as the Co-operative Group for Sustainable Development which also comprises Epping Forest District Council, Harlow Council and Uttlesford District Council. The group reports to a Board of Executive Members from each authority. This group is part of a wider group of authorities within the M11 corridor. Cumulative impacts have been addressed through a series of joint evidence base studies, including in particular the Strategic Housing Market Assessment (SHMA), transport modelling and Sustainability Appraisal, incorporating a Habitats Regulations Assessment. The authorities are in the process of completing a number of Memoranda of Understanding setting out how the authorities will continue to work with each other and key agencies such as Highways England and Natural England among others to plan for the wider housing market area.</p>
<b>Introduction</b>		
5.28	Paragraph 5.1.1 The Bishop's Stortford Liberal Democrats request that the second half of the last sentence be deleted as they dispute the validity of the	<p><b>No amendment to Plan in response to this issue</b></p> <p>The SHMA provides a robust basis of evidence on the housing needs of the district, which uses a</p>

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	housing need.	methodology widely accepted by the Planning Inspectorate.
5.29	Paragraph 5.1.3 The Plan should meet the needs of the elderly and include a mix of dwellings across the town including through the provision of retirement living options.	<b>No amendment to Plan in response to this issue</b> Housing type and mix is addressed through the Housing topic chapter of the emerging District Plan.
5.30	Paragraph 5.1.3 Bidwells suggest that reference to the Goods Yard is included in the introduction.	<b>No amendment to Plan in response to this issue</b> There is already reference to development within the town on previously developed sites.
5.31	The Bishop's Stortford Liberal Democrats request the removal of all references in paragraph 5.1.3 and throughout the Plan, to the development of land to the south of the town.	<b>No amendment to Plan in response to this issue</b> This site has been identified as an essential location for development to meet the needs identified in the SHMA, and also to provide a unique opportunity for Bishop's Stortford High School to expand and provide new facilities to serve both its pupils and the wider public through shared facilities.
5.32	Concerns about school capacity.	<b>No amendment to Plan in response to this issue</b> School capacity will be provided through additional primary and secondary schools at Bishop's Stortford North and South, and through the expansion of existing schools where necessary.
5.33	Paragraph 5.1.4 Countryside Properties requests that the words 'where an educational need is justified by the local education authority' to be added to the end of this paragraph.	<b>No amendment to Plan in response to this issue</b> Whilst the principle is agreed, it is superfluous in terms of policy wording because this is a requirement embedded in national policy and will be enforced through the planning application process.
5.34	A Cross-County rail link should be provided	<b>No amendment to Plan in response to this issue</b> HCC is considering a number of strategic sustainable transport options as part of its emerging 2050 Transport Vision. The Environment, Planning and Transport Cabinet Panel on 8th March 2016 considered a report 'Transport Vision – Post Stakeholder Engagement Report and Project Update' which included a long-list of schemes to be evaluated prior to public consultation later in the year. One of these schemes involved a 'Concept level scheme to link Luton, Stevenage and Stansted Airport by rail, connecting with the East-West rail scheme at Bedford' as a long-term scheme. Public consultation by HCC on the 2050 Transport Vision for Hertfordshire is expected imminently, and at that point it will become clear whether this scheme is still being promoted. If it is included, it is expected that delivery would be beyond the plan period.
5.35	Need a Sawbridgeworth bypass to avoid congestion on the A1184.	<b>No amendment to Plan in response to this issue</b> This issue is considered through the Sawbridgeworth Issues Report. Following the Preferred Options consultation, Essex County Council has undertaken transport modelling, known as VISUM, which covers the

Issue Number	Issues raised through consultation	Officer Response
		wider West Essex/East Herts area. The modelling assesses the impact of new housing on the strategic road network, including the A1184 through Sawbridgeworth. While this work is still ongoing, the modelling undertaken to date shows that the road network can cater for the proposed level of development, and that the impact of new development would not be 'severe'. For the purposes of Plan-making in Hertfordshire, this is considered to be when traffic causes highway safety concerns. The modelling demonstrates that the provision of a new Junction 7a on the M11 would ease existing pressure on the A1184.
5.36	Rail networks are over capacity and too expensive. Single track is not sufficient.	<b>No amendment to Plan in response to this issue</b> This is part of a national programme looking at rail opportunities, the most relevant being the potential four-tracking of the West-Anglia Rail Line from London to Stansted Airport.
5.37	The Canal and River Trust advocates resurfacing and widening of canal towpaths to assist with sustainable transport aspirations. They support the provision of additional public transport options.	<b>No amendment to Plan in response to this issue</b> Support noted. Opportunities to resurface and widen the canal towpath will arise primarily through development which directly abuts the river but the Council will look for the potential of other opportunities and/or supporting funding.
5.38	Adding a bypass at Little Hadham will push queues to Standon. The bypass will not alleviate issues in Bishop's Stortford. The A120 should also bypass Standon and Puckeridge, connecting directly to the A10.	<b>No amendment to Plan in response to this issue</b> Hertfordshire County Council (HCC) is progressing plans for a road bypass of Little Hadham. This is part of the existing policy for this A120 corridor between the A10 and the M11, agreed in 2006. The bypass is primarily intended to relieve environmental conditions at Little Hadham and to provide flood relief. The scheme is not itself designed to address traffic issues in Bishop's Stortford, but junction design will ensure that impacts are minimised where possible. Consideration of potential improvements at Standon also formed part of the policy agreed in 2006, and HCC is currently investigating key constraints and opportunities in delivering these. As part of that process, in February 2016 HCC sought the views of local residents and stakeholders to inform the assessment of options. The outcome of this assessment will feed into the long term Transport Vision that HCC is developing for Hertfordshire. Public consultation by HCC on the 2050 Transport Vision for Hertfordshire is expected imminently.
5.39	Roads cannot cope. More people will need more services which will increase movement around town centre adding to congestion, all roads in and out of the town are grid-locked at peak times.	<b>No amendment to Plan in response to this issue</b> Evidence gained from transport modelling and testing of mitigation measures suggests that whilst development will have a detrimental impact on congestion, this does not constitute a 'severe' impact according to the requirements of Paragraph 32 of the National Planning Policy Framework. Further details are set out in the Delivery Study Transport Report. For the purposes of Plan-making in Hertfordshire, this is considered to be when traffic causes highway safety concerns.
5.40	Unrealistic to expect people to take public transport to the town centre. Topography of the town and steep	<b>No amendment to Plan in response to this issue</b> It is acknowledged that it is unrealistic to expect traffic congestion to be solved by public transport or

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	hills needs to be taken into account when encouraging more walking and cycling.	increased levels of walking and cycling in isolation. However, the Council has a responsibility to identify potential solutions to transport issues which can enable development to proceed. There are opportunities for new and extensions to bus services in Bishop's Stortford which can mitigate to some degree against demands created by new development. Topography may deter some people from walking and cycling but there is still potential for increased take-up for some trips. Promotion of alternative transport options are components of an overall approach to transport and movement.
5.41	Bus networks are poor.	<b>No amendment to Plan in response to this issue</b> The opportunities for new bus links in Bishop's Stortford are amongst the best in the District. Development opportunities present unique opportunities to create new and extend existing bus networks.
5.42	Extend the bypass to the south-east to link up with the M11.	<b>No amendment to Plan in response to this issue</b> A bypass would divert some traffic movements from the town, but may actually draw in a greater volume of traffic from the strategic road network on to the bypass. The cost of a bypass in this area would be considerable given the environmental constraints of the railway line, the river Stort and its floodplain and designated wildlife assets including the Thorley Wash SSSI. Furthermore, it would be complicated because of the intervening land is in multiple landownerships. On 22 April 2015 the issue was discussed at a meeting with representatives of Uttlesford Council, which is Local Planning Authority for much of the route of any such road (meeting note available at <a href="http://www.eastherts.gov.uk/dtc">www.eastherts.gov.uk/dtc</a> ). Both Councils agreed that it is not realistic to expect this to be delivered within the Plan period. It is understood that while the south-eastern bypass is included in the long list of the County Council's 2050 Transport Vision which sets out a list of highway and transport related projects identified by the County Council for further consideration, there is no evidence that this infrastructure would be delivered within the Plan period.
5.43	The phasing of large developments should be monitored in terms of their impacts on road networks and stopped if they are deemed to be unacceptable.	<b>No amendment to Plan in response to this issue</b> Such monitoring is a requirement of the recent planning permission granted for Bishop's Stortford North. It cannot be used to stop development, only to ensure that new mitigation measures are sought if monitoring shows issues are arising from development that were not foreseen. It is possible that this monitoring and review of mitigation type of condition will be used more frequently in future.
5.44	Concern over the capacity of sewerage networks.	<b>No amendment to Plan in response to this issue</b> Utility providers such as waste water services have a statutory duty to ensure adequate infrastructure is in place. The Council is working with Thames Water to understand the impacts of development and to assist in the planning of upgrade programmes. Thames Water have provided up-to-date information to inform the Council's Infrastructure Delivery Plan and is already engaged by site promoters to test emerging proposals. There are no fundamental concerns with sites in Bishop's Stortford in terms of waste water networks.

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		Developers of new sites will be expected to pay for their connections and an upgrade to the relevant points in the network, but it is unreasonable to expect the developers to upgrade networks well beyond their site.
5.45	All infrastructure needs investment to support planned growth and to address existing deficiencies. Issues cited in healthcare in particular and recreational facilities.	<p><b>No amendment to Plan in response to this issue</b></p> <p>There are programmes in place looking at the provision of primary healthcare across the town. The Council is continuing to look at the best way of providing high quality sports and recreation facilities across the town catering for many sports in addition to football. Where developments directly increase demands on infrastructure, they will be expected to mitigate these impacts through either on-site provision, or where more effective, through contributions to existing facilities which may be off-site.</p>
5.46	Retail success depends upon good levels of parking and bus services.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Parking is a space hungry use and competes with other uses in the town. Its importance to the retail and economic life of the town is acknowledged. Whilst transport strategies are likely to focus more on encouraging a shift towards the use of non-car based travel options, rather than the provision of more parking, the potential for more provision will be considered where appropriate. Bus services in the town have the potential to provide for alternative modes of travel between the centre and residential areas and there are many opportunities through development to enhance existing and provide new services.</p>
5.47	The Bishop's Stortford Liberal Democrats request all reference to the development of the Causeway and Old River Lane be deleted.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The principle of redevelopment within this underused part of the town centre is long established and represents a unique opportunity to regenerate this part of the town. The Bishop's Stortford Town Centre Planning Framework will help inform strategies involving the town centre.</p>
5.48	Bidwells support the inclusion of the Goods Yard in this paragraph.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted.</p>
5.49	Inconsistency between other settlement chapters which use words to the effect of preserving the quality and character of the town's historic core, whereas this wording should also apply to Bishop's Stortford.	<p><b>Proposed amendment to Plan</b></p> <p>Agreed. Insert "Bishop's Stortford will preserve its market town character and the quality of the town's historic core will be respected in development proposals"</p>
5.50	To avoid impacting existing towns a new town should be planned.	<p><b>No amendment to Plan in response to this issue</b></p> <p>A new town takes many years to plan, requires huge swathes of land with willing landowners and vast amount of forward investment. In the meantime, the Government requires authorities to ensure there is a rolling five year supply of available, suitable and deliverable land for development in order to meet immediate housing needs and to address the undersupply arising from the economic downturn of the last few years. Therefore whilst it is agreed that a new town would reduce impacts on existing settlements it is unrealistic as</p>

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		a means to address the Government's current requirements.
<b>Development in Bishop's Stortford</b>		
5.51	Disagree with the inclusion of development on the Areas of Special Restraint for development.	<p><b>No amendment to Plan in response to this issue</b></p> <p>A significant part of the land at Bishop's Stortford North has been identified in the Council's Local Plan (the East Herts Local Plan, Second Review, April 2007) as safeguarded land available for future development. These sites are identified as Areas of Special Restraint 1-5 (ASRs 1-5) and a Special Countryside Area (SCA). The Council resolved in 2008 that as a result of a deficiency in the 5 year supply of housing land required by Government policy, development proposals should be brought forward for all the ASR and SCA sites. The designation of the land in this way reflects its identification in earlier planning policy documents, including in versions of the East of England Plan and the Hertfordshire Structure Plan. The potential for development to take place at the site has been identified in some way for a considerable number of years.</p>
5.52	Need a new section on the River Stort and its environment. Incremental development has jeopardised the river.	<p><b>Proposed amendment to Plan</b></p> <p>Noted. A new policy area on leisure and recreation will cover this area. This area of policy is also covered in the Natural Environment topic chapter.</p>
5.53	3 bedroom properties are needed most.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Strategic Housing Market Assessment and Housing Needs Survey will be used to set policy and determine applications to ensure that the most up-to-date position is used when determining the type and mix of dwellings provided through development.</p>
5.54	Prime farming land around towns should be protected for food production.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The supporting work undertaken during the Plan-making process has considered this. Being a largely rural district, much of the land that is not already developed is used for agricultural purposes. One consideration is to seek to ensure that residential development is directed to areas of lesser quality agricultural land, retaining the best in production. It is important to acknowledge that agricultural land grades are a broad classification and there will be pockets of varying land quality across a grade.</p>
5.55	Objection to the omission of land parcel and release from the Green Belt, site off Boundary Road, Hallingbury Road. (land between railway and allotments)	<p><b>No amendment to Plan in response to this issue</b></p> <p>This site has been assessed through the SLAA (01/030) which considered the land as being undeliverable and undevelopable with and without a policy change. The site lies outside the East Herts administrative boundary. The 2007 Local Plan Inspector found that this site would amount to a protruding developed wedge, poorly related to the form and pattern of the settlement. The 2015 Green Belt Review refers to the significant role this parcel has in Green Belt terms.</p>



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5.56	Objection to omission of land parcel west of Dolphin Way and rear of Kingsbridge Road.;	<p><b>No amendment to Plan in response to this issue</b></p> <p>This site has been assessed through the SLAA (01/007) which considered the land as being undeliverable and undevelopable with and without a policy change. The majority of the site is within Flood Zone 3 and lies within the green wedge which is important in defining the setting of the town. Incremental loss of small parcels within the green wedges will undermine their overall role.</p>
5.57	Objection to omission of land parcel on land east of Thorley Lane (0.73ha – up to 25 dwellings); Small sites are more deliverable.	<p><b>No amendment to Plan in response to this issue</b></p> <p>As noted in Issue 21 above, this site has been assessed through the SLAA. Site 41/007 is not considered suitable for development in the SLAA. It is not proposed to amend the Green Belt boundary to the east of Thorley Street/London Road.</p>
5.58	Diagram incorrect – the planning applications provide for 850 dwellings in the western neighbourhood, not 700 as shown. Figures 5.1 and 5.8 and the proposals map should include the option for any secondary school within Bishop's Stortford to provide its playing fields on the north of the A120.	<p><b>Proposed amendment to Plan</b></p> <p>Noted. Amend Key Diagram and Inset Maps to reflect latest position on the planning approval. While the secondary school playing fields are located beyond the A120 in the current permission, if this permission lapses, the Council's preference is to accommodate the entire school grounds within the developable area of the site (i.e. within the A120).</p>
5.59	The Environment Agency comments that a number of site allocations including BISH2 (The Mill Site), BISH3 (The Goods Yard) and BISH4 (Old River Lane) are located within Flood Zones 2 and 3. If, after undertaking the flood risk sequential Test these sites are the only possibilities for development the Council will need to undertake a Level 2 Strategic Flood Risk Assessment (SFRA). If this was not included as part of the evidence base the Environment Agency would find these allocations unsound.	<p><b>No amendment to Plan in response to this issue</b></p> <p>A Level 2 SFRA has been undertaken for the Goods Yard, the Old River Lane and Bishop's Stortford South sites. As the Plan is not allocating development at the Mill Site within the Plan period a Level 2 SFRA is not required. However, these issues would be considered if the site came forward through a planning application. East of Manor Links and the Hadham Road do not require a SFRA.</p>
5.60	More care homes are needed.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Strategic Housing Market Assessment and Housing Needs Survey will be used to set policy and determine applications to ensure that the most up-to-date position is used when determining the type and mix of dwellings provided through development. The demand for care homes and different types of accommodation for specialist residential needs is acknowledged and Policy HOU6 set out the policy approach to this type of development, while the provision of accessible and adaptable homes is contained in Policy HOU7.</p>



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5.61	Object to the omission of Thorley Place from the plan.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The District Plan allocates sites for strategic scale development. Smaller parcels of land such as Thorley Place are being considered through the SLAA.</p>
5.62	Clarity sought on what 'a proportion of the district's windfall allowance' is.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Windfall is calculated on a trend-based assessment District-wide. We cannot therefore provide a figure for Bishop's Stortford. However, it is reasonable to expect development on smaller sites to come forward throughout the Plan period in the town.</p>
5.63	Acknowledge and welcome new homes into the town provided they are supported by appropriate infrastructure, such as road improvements and layouts and provided they are in keeping with the town's character.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Noted.</p>
5.64	Expanding towns results in dormitory suburbs which are highly car dependant and physically separated from the historic centre.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Developments are required to incorporate sustainable transport measures which can enable transport choices and facilitate non-car modes of transport. Towns have and always will change and through a better appreciation of layout and design, new developments will be expected to make good connections to the existing built-up area, and through the integration of community facilities, will provide infrastructure that will benefit both the new and existing communities.</p>
5.65	The Bishop's Stortford Civic Federation request the removal of references to the East of Manor Links and Bishop's Stortford South sites from the policy.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Comprehensive work underpins the proposed development strategy. These two sites are required to meet not only the identified housing need for the District, but also to facilitate the development of other benefits such as the provision of community facilities including schools, and also to provide local job opportunities.</p>
5.66	Support for the inclusion of windfall in the policy.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted.</p>
5.67	Support for the inclusion of Bishop's Stortford North in the policy.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted.</p>
5.68	The artificial adoption of a rigid methodology based on a 500 house threshold to establish Areas of Search has led to the unjustified elimination of reasonable alternatives capable of delivering less than 500 dwellings. This does not comply with the SEA Directive	<p><b>No amendment to Plan in response to this issue</b></p> <p>The District Plan primarily seeks to deal with strategic-scale development, and does not seek to allocate all areas of land which could accommodate development. The Areas of Search approach considered a wide range of options, including theoretical smaller quantum of development where this was considered</p>

Issue Number	Issues raised through consultation	Officer Response
	and also fails to address the shortfall in the five-year housing land supply. An example of a site which has been unreasonably knocked out is Call for Sites 01/017, within a Green Finger north of the Great Hadham Road. This site has a developable area of 2.49ha and could accommodate 53-63 dwellings. All reasonable sites should be judged against the criteria in paragraph 152 of the NPPF.	appropriate. This is all detailed in the Supporting Document. In addition, the Strategic Housing Land Availability Assessment (SLAA) has assessed these alternative smaller sites. The SLAA assessment concluded that this site was not considered deliverable or developable with or without a change in policy as it is within a designated area of open space and a Local Green Space, plus the green wedge is important in defining the setting of the town. Incremental loss of small parcels within the green wedges will undermine their overall role. The SEA Directive requires authorities to consider the likely potential impacts of a Plan and to ensure that reasonable alternatives to the development strategy have been considered. It does not require authorities to allocate all sites that may contribute to the supply of housing. The District Plan has been subjected to a Sustainability Appraisal which will be published alongside the District Plan.
5.69	The minimum development at Bishop's Stortford North will be 2,500 dwellings, since secondary school playing fields will be provided to the north of the A120, not within the main site.	<b>Proposed amendment to Plan</b> Noted. The Plan will be updated to reflect the number granted through the planning permissions. This will also ensure there is a policy basis within the Plan if the current planning permissions lapse.
5.70	Flightpaths from and to Stansted Airport were defined because of the location and shape of the town and the undeveloped nature of the land below.	<b>No amendment to Plan in response to this issue</b> The development of the town and the airport has evolved together over time, with the orientation of the runway being dictated by prevailing winds affecting this part of the country. Policy has always sought to avoid development within the areas of land most affected by noise and within the flightpath safety zone. This policy approach remains.
5.71	Large sites take many years to progress, so flexibility should be built into the Plan by allocating a number of smaller sites.	<b>No amendment to Plan in response to this issue</b> This is the approach taken within the Plan. Not all large sites are complex or require long lead-in times and so can still be phased for early delivery. The Plan allocates sites of a variety of size and makes provision through its Development Management policies for the consideration of other sources of housing delivery such as through windfall development.
5.72	Hockerill junction is already congested and air quality is a problem. Not a safe pedestrian crossing because of insufficient time between the lights.	<b>No amendment to Plan in response to this issue</b> This junction is an identified Air Quality Management Area and is being considered as part of the Bishop's Stortford Planning Framework. Improvements to the road network in other parts of the town, such as the introduction of a bus route through the Goods Yard site and the potential reassessment of the one way system, as part of a wider strategy, have the potential to alleviate some congestion at this junction. The Council acknowledges the impact that vehicular use of the junction has in terms of a barrier to pedestrian movement and will continue to assess how further development affects that.
5.73	Character of the town is being eroded by development.	<b>No amendment to Plan in response to this issue</b> The historic core of the town will remain subject to Conservation Area protections. It is to be expected that

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		the character of towns will change as development occurs over time, and this process should be carefully managed.
<b>The Mill Site</b>		
5.74	Hertfordshire County Council state that certainty over the potential number of properties to be delivered on this site would assist them in ensuring the provision of education facilities are planned for.	<p><b>No amendment to Plan in response to this issue</b></p> <p>It is not possible to determine the number of properties that could be delivered on this site at present as it not being made available for development at this current time and delivery may occur on different parts of the site independently. The Council has continued to liaise with HCC with regard to up-to-date details of planned dwelling numbers and their anticipated phasing of delivery. Therefore there is considered to be sufficient information at this stage to understand the requirement for school places as development progresses. As and when development opportunities become planning applications, more detail on the number, type and mix of dwellings at any site will be known and more detailed calculations can be undertaken to determine pupil yield and peak requirements for school places.</p>
5.75	Hertfordshire County Council support Part I (n) of this policy.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted.</p>
5.76	Hertfordshire County Council state that the impact of development at the Mill Site is not expected to lead to any major issues on the road network, beyond local access issues which can be resolved through an application.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Noted.</p>
5.77	The Canal and River Trust states that the financial viability and desirability of the site for use as moorings should be considered and established prior to any requirement to provide moorings being included. Suggest that the policy be reworded to state the desirability of such a feature, subject to further investigation. The facility should be referred to as a 'mooring basin' or 'moorings' as the proposed basin is not located on a canal. The policy should state the desirability for such a feature but not deem it essential.	<p><b>Proposed amendment to Plan</b></p> <p>Agreed. Delete c) and d) from Part 1 of the policy. Include the following in the supporting text preceding the policy: "Consideration should be given to the potential for moorings as part of the development of the site." This concurs with the initial advice received in relation to the emerging Bishop's Stortford Planning Framework, which suggests that a canal basin would take up a large proportion of the site and prevent the site being used effectively for commercial uses.</p>
5.78	The potential of using the waterway as part of a decentralised heating and cooling system should be	<p><b>No amendment to Plan in response to this issue</b></p> <p>The policy will retain the requirement to assess the feasibility of providing a decentralised heating system.</p>

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	considered.	Alternatively, the river may be a source of electricity through hydro-power technology.
5.79	The site would provide an opportunity to deliver housing in a sustainable location, possibly even a car-free development. Suggest removing the word 'limited' residential apartments from Part I(a).	<p><b>Proposed amendment to Plan</b></p> <p>The potential for a car-free development is acknowledged. The Council will consider issues that such an arrangement may result in, including the potential for new residents themselves, in due course, to opt for car ownership. Alternative wording could be applied that refer to 'a mixture of uses, including residential apartments on the upper floor of commercial employment uses' rather than use of the word 'limited'. This concurs with advice received through the Planning Framework.</p>
5.80	Support for high quality design and public realm, including the improvement of pedestrian options. Should include requirement for bridge widening or the construction of a parallel foot bridge.	<p><b>Proposed amendment to Plan</b></p> <p>Part I (h) already refers to a new bridge to facilitate the pedestrian circuit. This will be expanded further to refer to bridge widening where it is required as part of the wider objectives for this part of the town presented in the Bishop's Stortford Planning Framework.</p>
5.81	English Heritage (now Historic England) welcomes the reference at (g) to the "retention and renovation of the most significant historic buildings, including improving the setting of the Registry Office and adjacent listed building". The policy should include a requirement to protect, conserve and enhance the designated and non-designated heritage assets at the site and their settings. The site's location within the Bishop's Stortford Conservation Area should be referred to. These requirements should be included in the proposed conceptual master plan.	<p><b>Proposed amendment to Plan</b></p> <p>While it is not necessary to repeat the Heritage Asset policies here, the Mill Site policy should indeed refer to the listed Registry Office building in more detail, in particular in relation to its setting. The policy and supporting text will therefore be amended to reflect this and encourage the improvement of the building's setting.</p>
5.82	<p>Silver Spoon (owner of the Allinson Flour Mill) states that whilst the site is operational and not available for development it is acknowledged that the site has development potential. Concerned that the 2011 Development Brief is aspirational and no consideration has been given to the viability of the development options.</p> <p>The requirement to provide marketing evidence in the Economic Development policies is contradictory to the objectives of site specific allocations. The following</p>	<p><b>Proposed amendment to Plan</b></p> <p>It is noted that the site is not currently presented as being available. However, given the potential for the site to contribute to wider aspirations for the town, including through the creation of new pedestrian routes, commercial and leisure uses, it is considered necessary to maintain a Policy to guide development should the site become available within the Plan period. The policy will be re-written to be less prescriptive (see also Issue 84 below).</p> <p>The 2011 Development Brief will be superseded by the emerging Town Centre Planning Framework and therefore the more appropriate way forward is through the creation of a collaboratively produced Masterplan, which considers this site in relation to the wider town.</p>

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	<p>amendments to the economic development policies are proposed:</p> <p>“c) the proposal does not prejudice the continued viability of existing Employment Areas and existing operational employment sites and neighbouring uses, and</p> <p>d) the proposal is in line with a site specific development allocation within the Plan.”</p>	<p>The Economic Development Chapter policies have been amended to clarify the policy position between sites that are allocated for future residential development which are currently designated as Employment Areas.</p>
5.83	<p>Silver Spoon provides the following suggested amendments to the draft policy requirements:</p> <p>part a) amend as follows: “residential-led mixed use development, including economic development’ as defined in the NPPF”. ‘Commercial employment uses’ is too onerous a requirement and should be amended to “uses defined as economic development”. The opportunity to maximise the sites’ residential potential should not be lost through limiting such uses to upper floors.</p> <p>Part b) should be deleted as too restrictive and does not take into account viability and the market.</p> <p>Part c) should be deleted as engagement with the Canal and River Trust has indicated that they are not committed to the provision of moorings and there is no funding. This is therefore an unsubstantiated policy requirement.</p> <p>Part d) should be deleted as the form and layout of uses and buildings should be informed as part of the design process at the time when the redevelopment scheme is brought forward. This requirement is therefore onerous and prejudices the redevelopment potential and options for the Mill Site.</p> <p>Part e) no objection</p> <p>Part f) request that ‘subject to viability considerations’ is added to this criterion.</p>	<p><b>Proposed amendment to Plan</b></p> <p>(a)(b)(d) and (f) could be combined and alternative wording could be applied that refers to ‘a mixture of uses, including residential apartments above commercial, retail and leisure uses with active frontages which contribute to a public realm along the river frontage in particular’. ‘Economic development’ is too broad a term as it encompasses all B uses. The term ‘commercial uses’ can be applied much more flexibly and implies a more active use generating footfall.</p> <p>The creation of a pleasant walking environment along the river is not an unreasonable request given the location of the site and the valuable role it could have in contributing to a wider strategy for the town linking this site and the Goods yard and rail station to the town centre.</p> <p>(c) The provision of houseboat moorings is now required in the Housing and Planning Act 2016 so this will need further investigation with the Canal and River Trust and British Waterways. Moorings create a valuable opportunity to not only provide alternative means of accommodation but also to ensure activity and self-policing of the river network and as a means of income to support maintenance through the purchase of licences.</p> <p>(f) It is a given that all proposals are subject to an assessment of viability at the time of an application, so there is no need to add this to the policy. This could be tied better in to bullets (h) and (m) which will need to specify an appropriate means of crossing the river to better connect the site to the town centre.</p> <p>(g) Disagree. Having regard to the setting is not as strong as improving the setting. If the site is to be redeveloped then opportunities to improve the setting of the Listed Buildings should be taken.</p> <p>(h) This will need to take into account emerging recommendations in the Town Centre Planning Framework.</p> <p>(i) Agreed. Rather than a source of heating and cooling, perhaps the river could be used for a hydro-power scheme as a means of generating electricity. See also Issue 91 below.</p> <p>(j) The site may not be suitable for pocket parks, but high quality public realm is vital for this site.</p>

Issue Number	Issues raised through consultation	Officer Response
	<p>Part g) should be amended as follows: 'retention and renovation of the listed buildings within the site, and comprehensive redevelopment of the site to have regard to the setting of the adjoining Listed Registry Office'.</p> <p>Part h) unclear what is meant by 'new bridge'. Amend and combine with Part m) as follows: 'safeguarding of a strip of land within the Mill Site to facilitate, and/or contributions towards offsite highway works in connection with Station Road Bridge, in accordance with Policy BISH9 criterion b, subject to viability considerations'.</p> <p>Part i) add 'where practically feasible, and subject to viability'</p> <p>Part j) delete as site not large enough</p> <p>Part k) no objection – part of masterplanning process</p> <p>Part l) delete as necessary utilities will be provided as a matter of course.</p> <p>Part n) add 'as appropriate, subject to viability and relevance to the scheme being proposed'</p> <p>Part o) imprecise – amend to 'other relevant policy provisions of the District Plan'</p>	<p>(k) noted.</p> <p>(l) will be expanded to be consistent with other policies.</p> <p>(n) Viability reference removed but the site will be expected to delivery necessary on-site and appropriate off-site infrastructure.</p> <p>(o) New reference to the Neighbourhood Plan will be added.</p>
5.84	<p>Silver Spoon requests that Part II be amended as follows: "the site will be developed in accordance with a conceptual masterplan to be prepared based on the development principles set out in this Policy, and to be submitted with a planning application."</p>	<p><b>Proposed amendment to Plan</b></p> <p>It is important to ensure that there is a collaborative approach taken to the development of the Masterplan, rather than a masterplan just be presented as part of the application documents. While no specific amendment is proposed in response to this issue, Part II of the Policy should be amended accordingly.</p>
5.85	<p>Silver Spoon requests that Part III be deleted as the proposed development could take a number of different forms and design solutions.</p>	<p><b>Proposed amendment to Plan</b></p> <p>Reference to building design avoiding a canyon effect is an important element of this policy. Reference to heights will be removed but the impact of building design will be integrated in a wider criteria on the riverside environment.</p>
5.86	<p>Silver Spoon comment that the development of the Mill Site should not be linked to a comprehensive development including the Good Yard as the Goods</p>	<p><b>Proposed amendment to Plan</b></p> <p>It is acknowledged that the timing of delivery of the two sites are different. However, the importance of the</p>

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	Yard is deliverable now and should be brought forward at the earliest possible opportunity. The present owners of the Mill Site do not wish to move.	Mill Site and Goods Yard in terms of their potential value to the town in making best use of the river as an asset and as a means of connecting the sites to the town centre and station should be a guiding principle connecting the development of both sites. The policies for both sites will be amended.
<b>The Goods Yard</b>		
5.87	HCC state that the impact of development at the Goods Yard Site is not expected to lead to any major issues on the road network, beyond local access issues which can be resolved through an application.	<b>No amendment to Plan in response to this issue</b> Noted. However, Policy BISH3 is for a development of 200 homes. The planning application will need to undertake testing on the proposed number of homes to confirm this is indeed the case.
5.88	The site should be brought forward for development to make an unattractive area better. Development should be high quality design	<b>Proposed amendment to Plan</b> The policy on the Goods Yard will be amended to place more emphasis on high quality design. The Council commissioned a design review of the Goods Yard application, which provides a useful basis for guiding the development of proposals on this site, and its output will be incorporated into the policy where appropriate. Further guidance has also been provided through the Town Centre Planning Framework, which will also be incorporated where appropriate.
5.89	Hertfordshire County Council support Part I (l) of this policy.	<b>No amendment to Plan in response to this issue</b> Noted.
5.90	Support for development on this site provided it has multi-storey parking and a link road through the town.	<b>Proposed amendment to Plan</b> Support noted. The policy will be updated to refer to the provision of appropriate levels of parking on the site and the provision of a sustainable route through the site for buses.
5.91	The Canal and River Trust support ambitions to improve the waterway through the town and welcome the need to integrate the river into the development proposal. The river should be considered as a source of decentralised heating and cooling.	<b>No amendment to Plan in response to this issue</b> Support noted. The policy will retain the requirement to assess the feasibility of providing a decentralised heating system. Alternatively, the river may be a source of electricity through hydro-power technology.
5.92	Support for active ground floor uses, public spaces, direct routes connecting the town centre and the station and restricting building heights beside the river. Also support for restricting parking and minimising town centre congestion.	<b>No amendment to Plan in response to this issue</b> Support noted.
5.93	Minimising on-site parking will exacerbate overspill on-street parking and will prevent people from parking	<b>No amendment to Plan in response to this issue</b> There are clearly different opinions on the appropriate level of parking to be provided on-site. The policy

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	near businesses in the town centre. There needs to be sufficient on-site parking for all occupiers, users of the train station, businesses in the town centre and for disabled users and trades people. Bishop's Stortford Town Council comments that the requirement should be to minimise the need for onsite parking not to minimise onsite parking itself. The site is already used as a car park.	position will remain that development proposals should be judged against the parking standards that will be included in the plan, taking account of the sustainable location of the site. Hertfordshire County Council has stated (November 2014) that it would prefer to see <i>"a lower level of car parking provision complemented by comprehensive measures and improvements aimed at supporting increased travel by sustainable transport modes i.e. improved bus services and associated infrastructure and improved cycle and pedestrian routes and facilities."</i>
5.94	As a brownfield site this area should come forward as a priority over green field sites.	<b>No amendment to Plan in response to this issue</b> Agreed. This is the approach advocated throughout the Plan. However, it is important to note that the authority has to maintain a five year supply of land for residential development, and this will require a mixture of greenfield and brownfield sites to be delivered simultaneously, particularly in locations where brownfield sites have constraints that require resolution prior to development.
5.95	Herts and Middlesex Wildlife Trust comments that opportunities to enhance the River Stort are maximised in accordance with the Stort Catchment Management Plan. HMWT welcomes BISH3 (j).	<b>Proposed amendment to Plan</b> Noted. Developers will be expected to consult with the relevant authorities to ensure such opportunities are acted upon. Reference to the Stort Catchment Management Plan will be included in the supporting text and/or policy where appropriate.
5.96	Hertfordshire County Council comments that the masterplan should maximise the benefits of sustainable transport links, and that transport modelling with and without the potential Link Road and other mitigation measures should be undertaken	<b>No amendment to Plan in response to this issue</b> Further work on this has been undertaken by the site promoters (Network Rail and Solum Regeneration) working with the County Council. The requirement to fully understand the traffic and transport implications of the site will remain in the policy.
5.97	Part e) add 'and views towards St. Michael's Church'	<b>Proposed amendment to Plan</b> Agreed. From the railway station the top of the spire of St Michael's church is just visible above the intervening buildings. The policy will be amended to reference this important landmark. This concurs with initial advice provided through the emerging Bishop's Stortford Town Centre Planning Framework.
5.98	Policy should reference enhancing a transport hub in accordance with BISH9, and improving the quality of pedestrian and cycle links to the transport hub. This would be in line with the Bishop's Stortford Silverleys and Meads Neighbourhood Plan.	<b>Proposed amendment to Plan</b> Agreed. The station is an integral part of this site and so all opportunities to enhance this area as a transport hub for the town should be taken. The policy already requires direct routes to the station, but will be amended to emphasise the importance of routes and connections through the site and to the station and an improved transport hub.



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5.99	Solum Regeneration (development partner to Network Rail) comments that more flexibility is needed in the policy to ensure that deliverability of the site is not frustrated by undue planning policy constraints. The number of dwellings should be increased from 200 to 450. Various other amendments are proposed, including reference to dwelling size, building heights and open spaces.	<p><b>Proposed amendment to Plan</b></p> <p>The emerging Neighbourhood Plan for Bishop's Stortford South, Central Wards and part of Thorley states that development on the site should be up to 400 dwellings. PBA undertook an assessment which indicated that a residential-led, mixed use development of 450 homes, which was put forward by the site promoters, was viable for the site given other infrastructure requirements. Further assessments, including the emerging Bishop's Stortford Town Centre Planning Framework and advice from Tibbalds indicate that the site should plan for a wider mix of uses and house type, design and layout that what is currently proposed through the planning application for the site which proposes 682 residential units, all of which would be apartments. The role of the site for providing space for offices and retail uses is also noted in the advice. Officers therefore consider that it is appropriate to include a policy within the Plan to provide a framework for moving forward with the site should the current proposals change. The policy will make reference to the provision of other uses and therefore anticipates that the number of homes that could therefore be delivered on the site will reduce accordingly. The policy will therefore allocate this site for 400 homes.</p>
5.100	Reference to the 2011 Planning Brief should be removed as it will be out of date.	<p><b>Proposed amendment to Plan</b></p> <p>Some principles within the Brief will remain relevant however, more up to date assessments, including the Bishop's Stortford Town Centre Planning Framework and advice from Tibbalds should be incorporated into the emerging masterplan for the site.</p>
5.101	The Hertfordshire Local Enterprise Partnership (LEP) comments that the site is considered suitable for high density development due to its close proximity to the town centre and train station and therefore the indicative housing figure should be increased.	<p><b>Proposed amendment to Plan</b></p> <p>The emerging Neighbourhood Plan for Bishop's Stortford South, Central Wards and part of Thorley states that development on the site should be up to 400 dwellings.</p> <p>PBA undertook an assessment which indicated that a residential-led, mixed use development of 450 homes, which was put forward by the site promoters, was viable for the site given other infrastructure requirements. Further assessments, including the Bishop's Stortford Town Centre Planning Framework and advice from Tibbalds indicate that a wider mix of uses, design and layout should be included to ensure the site delivers an appropriate gateway into the town. Therefore it is appropriate to allocate the site for 400 homes along with other B1 and retail uses (see Issue 99 above).</p>
5.102	Thames Water has concerns specifically that the sewerage network in the area is unlikely to be able to support the demand anticipated from the development. It will be necessary to investigate possible impacts of the development. It should be noted that in the event of an upgrade to Thames Water assets being required, up to three years' lead in time will be necessary. Thames	<p><b>No amendment to Plan in response to this issue</b></p> <p>The site promoters have addressed these issues through the work undertaken to prepare the current planning application.</p> <p>This wording may be necessary for many sites and is therefore more appropriate to include in Policy DPS4 Infrastructure Requirements.</p>

Issue Number	Issues raised through consultation	Officer Response
	Water asks that the following paragraph is included in the Development Plan: "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."	The developers will be expected to address these issues through planning applications.
<b>The Causeway/Old River Lane</b>		
5.103	No evidence that the Hendersons proposal will help reduce outflow from town centre or attract visitors.	<b>No amendment to Plan in response to this issue</b> The Council has undertaken several studies with regard to the retail capacity of the town centres in recent years. The Town Centre Planning Framework for Bishop's Stortford, once completed will provide a more complete picture of all the issues which need to be addressed to enable the town centre to function well and maintain customer footfall in the future. Evidence indicates that our retail centres must grow and change their offer in order to ensure a status quo position. A variety of uses within the town centre that generate more footfall will help enliven the town centre and reduce the number of people travelling out of the town for retail and leisure uses.
5.104	Functions such as the County Court and other major civic services should be relocated to Bishop's Stortford.	<b>No amendment to Plan in response to this issue</b> All providers of public services are being challenged to ensure that they are being provided in the most efficient and effective manner and in a way that best meets needs. This has led to rationalisation of service provision in many towns. However the town retains a wide range of services and facilities compared with other towns in the District and beyond.
5.105	Smaller shop units are needed rather than department stores. Too many non-retail uses in the town centre.	<b>No amendment to Plan in response to this issue</b> A variety of uses within the town centre that generate more footfall will help enliven the town centre and reduce the number of people travelling out of the town for retail and leisure uses. There is a role for larger franchises which act as key attractors which benefit smaller stores which provide variety and interest.
5.106	The lack of town centre parking is causing the decline of the town centre. Additional parking is needed.	<b>No amendment to Plan in response to this issue</b> Parking is a space hungry use and competes with other uses in the town. Its importance to the retail and economic life of the town is acknowledged. Whilst transport strategies are likely to focus more on encouraging a shift towards the use of non-car based travel options, rather than the provision of more

Issue Number	Issues raised through consultation	Officer Response
		parking, the potential for more provision will be considered where appropriate. Bus services in the town have the potential to provide for alternative modes of travel between the centre and residential areas and there are many opportunities through development to enhance existing and provide new services.
5.107	Development will harm the floodplain of the River Stort. Underground parking should not be considered in an area of flood risk.	<b>No amendment to Plan in response to this issue</b> Mitigation measures would be required to ensure that development does not increase risk of flooding to existing and new buildings. The policy does not require underground parking.
5.108	The town needs more leisure facilities to reduce people driving to neighbouring towns.	<b>No amendment to Plan in response to this issue</b> Noted. The Council is currently preparing a leisure strategy and these issues are being considered through the Bishop's Stortford Town Centre Planning Framework. Even with the provision of new facilities, it is anticipated that there will remain a proportion of people travelling outside the town for leisure purposes, particularly when combined with other activities such as retail or employment, or for specialist sporting activities for example. It should also be noted that given the town's location, existing leisure facilities also attract visitors from outside the town.
5.109	Bishop's Stortford Liberal Democrats suggest deletion of this policy as the development is hugely controversial.	<b>No amendment to Plan in response to this issue</b> A policy framework is required for this site, which is a major brownfield development opportunity to support and ensure the long-term vitality of the town centre. It will also provide opportunities for the delivery of homes in a central and sustainable location which will in turn assist in retaining the vitality and viability of the town centre.
5.110	Pedestrianisation would help to revitalise the town centre.	<b>Proposed amendment to Plan</b> It is likely that the Town Centre Planning Framework for Bishop's Stortford will advocate partial pedestrianisation in some town centre locations as part of a package of measures to make the town centre more user-friendly. It should be noted that pedestrianisation has both positives and negatives. The policy will be amended to introduce more criteria on design, which will include the provision of safe and accessible routes for pedestrians and cyclists.
5.111	Hertfordshire County Council support Part I (g) of this policy.	<b>No amendment to Plan in response to this issue</b> Noted.
5.112	Hertfordshire County Council state that certainty over the potential number of properties to be delivered on this site would assist them in ensuring the provision of education facilities are planned for.	<b>Proposed amendment to Plan</b> The need for certainty is acknowledged but, at this stage, proposals for the site are not sufficiently advanced to be able to provide that. Never the less, it is considered that the site is unlikely to deliver such significant

Issue Number	Issues raised through consultation	Officer Response
		additional housing numbers that school planning cannot be undertaken.
5.113	Site is excessive and contains inappropriate uses.	<p><b>Proposed amendment to Plan</b></p> <p>The policy does not currently specify uses, but will be amended to refer to specific uses as appropriate.</p>
5.114	English Heritage (now Historic England) requests that the setting of the site within the Conservation Area should be referred to. English Heritage previously expressed concerns about the scale, extent and justification with special regard to potential adverse impacts on a number of heritage assets, including the scheduled monument (Waytemore Castle). The Plan should consider other sites for retail and leisure purposes where they would have less of an impact on the heritage assets of the town.	<p><b>Proposed amendment to Plan</b></p> <p>Agreed. The policy will be amended to make specific reference to heritage assets. Development that protects and enhances the setting of heritage assets, including Conservation Areas can be a positive addition.</p> <p>The following words could be inserted under (d) "a design and layout which respects the significance and relationship of the site with designated and undesignated heritage assets <u>as part of the Conservation Area</u>".</p>
5.115	Waitrose comments that the allocation as identified in Figure 5.4 should be extended to include the existing building and potential store extension area.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The proposed allocation at Old River Lane is for mixed-use redevelopment of the Council building and car park. The existing Waitrose store is an important retail facility and inclusion within an area designated for redevelopment could undermine that role. The inclusion of the Waitrose store within the Primary Shopping Area reinforces its key role and exclusion from the site would not impede plans to extend the store if this was deemed appropriate in other policy terms.</p>
<b>Reserve Secondary School Site, Hadham Road</b>		
5.116	The site should only be used for education or for school playing fields, not housing. The Bishop's Stortford Civic Federation states that this site should be retained for education and not released for housing. The combined secondary requirement for Bishop's Stortford and Sawbridgeworth is 10FE, and the proposal for a 5FE school at BSN is therefore insufficient. Alternatively leave Bishop's Stortford South undeveloped, which would reduce demand by 1-2FE.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The secondary school provided through the Bishop's Stortford North development will be six forms of entry. The County Council's latest advice indicates that this is anticipated to meet the peak yield from the development as well as the demand from the existing community in the medium term. The site already has planning permission for redevelopment for 163 homes predicated on the delivery of a secondary school at Bishop's Stortford North, and is therefore linked to the delivery of the larger site. It is considered appropriate to retain this policy within the Plan to reserve the site for educational uses in case the Bishop's Stortford North application does not proceed or does not deliver the secondary school. The County Council is working with all schools in the town to ensure sufficient places are provided. This could be met through the relocation and expansion of Bishop's Stortford Boys School to land to the south of Whittington Way and through the expansion of the Herts and Essex High School.</p>

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5.117	Development should only happen if vehicle speeds are reduced and mitigation is in place to deal with resulting increase in traffic.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Controlling traffic speed on the highway network falls under the role of Hertfordshire County Council. Strict regulations on planning obligations mean that only impacts arising from the development can be mitigated through such means. However, where appropriate, planning obligations can be sought to contribute to improvements to the highway network, which may include improvements to access points for example, which would have the beneficial effect of slowing vehicle speeds.</p>
5.118	BISH5 needs to be redrafted to reflect the emerging proposals of the site in relation to the Bishop's Stortford North development.	<p><b>Proposed amendment to Plan</b></p> <p>The site already has planning permission for redevelopment for 163 homes predicated on the delivery of a secondary school at Bishop's Stortford North, and is therefore linked to the delivery of the larger site. It is considered appropriate to retain this policy within the Plan to reserve the site for educational uses in case the Bishop's Stortford North application does not proceed or does not deliver the secondary school. The policy will refer to the 163 homes granted permission and will contain a new site location map.</p>
5.119	Sport England object to the site allocation as no reference is made in the policy as to how the loss of the former playing field on the western part of the site would be mitigated if the site is released for potential development. Objection would be addressed if either part of the site were designated or Policies BISH7-9 for a new secondary school require the playing fields to be designed to accommodate both school and community use.	<p><b>Proposed amendment to Plan</b></p> <p>The County Council have signed a Section 106 Agreement on application B on this site, which is for 163 homes. This option retains the open spaces in the west of the site and the area of woodland in the southern part of the site. These will be identified as open space on the Policies Map. The Section 106 Agreement also makes provision for contributions to the provision of off-site open space improvements. In addition, applications for any new or extended secondary school provision across the town will be expected to ensure that an adequate provision of open space is provided which should be designed to accommodate community use. Therefore the objections of Sport England have been addressed.</p>
5.120	Concerns that health facilities should be provided or else waiting lists will grow.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Council is working closely with healthcare providers to ensure that there is a sufficient provision of healthcare facilities across the town. Where a strategic allocation is expected to provide a facility as part of the development, this will be detailed within the Infrastructure Delivery Plan.</p>
5.121	<p>Herts and Middlesex Wildlife Trust support part c) and e) and comment that the southern portion of the site should be retained and enhanced where possible, as part of a green infrastructure plan.</p> <p>The woodland prevents Maze Green from coalescing into Bishop's Park.</p>	<p><b>Proposed amendment to Plan</b></p> <p>The County Council have signed a Section 106 Agreement on application B on this site, which is for 163 homes. This option retains the open spaces in the west of the site and the area of woodland in the southern part of the site. These will be identified as open space on the Policies Map. The Section 106 Agreement also makes provision for contributions to the provision of off-site open space improvements.</p>

Issue Number	Issues raised through consultation	Officer Response
5.122	The site should be used for a sixth form college to reduce the need for students to travel to Hertford Regional College or Cambridge and to provide further education opportunities for adults.	<p><b>No amendment to Plan in response to this issue</b></p> <p>HCC advise that within Hertfordshire there is an expectation that secondary schools will provide for sixth form and further education opportunities.</p>
5.123	Hertfordshire County Council comments that the impact of a school on traffic in this location would be localised and would only affect the morning peak hour. If the site was used for 250 homes, and the school was located on the land north of Bishop's Stortford, then impacts would again be localised, and the wider impacts similar. Any improvements to the highway network and sustainable transport required to deliver the development should be identified as part of the planning application process and delivered through a Section 278 or Section 106 agreement. Work is currently being undertaken by Children, Schools and Families to ascertain the traffic impact of a six form entry secondary school on this site.	<p><b>Proposed amendment to Plan</b></p> <p>The site now has planning permission for redevelopment for 163 homes predicated on the delivery of a secondary school at Bishop's Stortford North, and is therefore linked to the delivery of the larger site. It is considered appropriate to retain this policy within the Plan to reserve the site for educational uses in case the Bishop's Stortford North application does not proceed or does not deliver the secondary school. The policy will refer to the 163 homes granted permission and will contain a new site location map.</p>
5.124	Thames Water comments that it does not envisage waste water concerns in relation to this site.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Noted.</p>
5.125	Hertfordshire County Council states that an outline planning permission for residential development of the Reserve Secondary School site is to be submitted to East Herts Council in summer 2014. This will enable the land swap to take place which facilitates the provision of 6FE secondary school within the Bishop's Stortford North development. The release of this site is therefore likely to be before 2021 as stated in the policy.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The site now has planning permission for redevelopment for 163 homes predicated on the delivery of a secondary school at Bishop's Stortford North, and is therefore linked to the delivery of the larger site. It is considered appropriate to retain this policy within the Plan to reserve the site for educational uses in case the Bishop's Stortford North application does not proceed or does not deliver the secondary school. The policy will refer to the 163 homes granted permission and will contain a new site location map. Whilst originally anticipated that delivery may take place prior to 2021, the timescale of development is now such that it is not currently anticipated that this site will come forward within the first five years of the Plan period.</p>
5.126	Unrealistic to restrict delivery of housing at Hadham Road to post-2021 because receipts from the land swap/residential sales will be needed to part-fund the	<p><b>No amendment to Plan in response to this issue</b></p> <p>Whilst originally anticipated that delivery may take place prior to 2021, the timescale of development is now such that it is not currently anticipated that this site will come forward within the first five years of the Plan</p>

Issue Number	Issues raised through consultation	Officer Response
	provision of a school.	period.
5.127	Bishop's Stortford Town Council comments that in accordance with the Bishop's Stortford and Silverleys Neighbourhood Plan the reserve site should be released only if sufficient additional secondary school capacity is provided elsewhere in the town and a new secondary school is constructed on the northern urban extension.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The site already has planning permission for redevelopment for 163 homes predicated on the delivery of a secondary school at Bishop's Stortford North, and is therefore linked to the delivery of the larger site. It is considered appropriate to retain this policy within the Plan to reserve the site for educational uses in case the Bishop's Stortford North application does not proceed or does not deliver the secondary school. The County Council is working with all schools in the town to ensure sufficient places are provided. This could be met through the relocation and expansion of Bishop's Stortford Boys School to land to the south of Whittington Way and through the expansion of the Herts and Essex High School.</p>
<b>East of Manor Links</b>		
5.128	Hertfordshire County Council support Part I (j) of this policy.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted.</p>
5.129	Objection to additional development off Manor Links, citing loss of Green Belt, loss of green space, loss of tranquillity in Manor Links and surrounding roads, additional vehicle movements (particularly at peak time) and unsafe access to Dunmow Road.	<p><b>Proposed amendment to Plan</b></p> <p>The Settlement Appraisal for the town sets out the decision to reduce this site allocation from 150 homes to 50 and addresses the issues identified here.</p>
5.130	Concerns about primary access to Dunmow Road being through Manor Links, and the safety of access to/from BISH6 onto Dunmow Road, which is busy and where traffic regularly exceeds the 30mph limit. Concerns about safety of school children being dropped off and crossing the road to Birchwood School. Poor visibility at existing roundabout – requires redesigning. New roundabout should be designed to serve both Woodside Industrial Estate and the new development. All vehicle traffic should be access from Dunmow Road rather than through Manor Links. Plans should be amended to this effect.	<p><b>Proposed amendment to Plan</b></p> <p>Traffic assessments have indicated that there would be no adverse impacts arising from an additional 50 homes accessed from Manor Links. Improvements may be required to Dunmow Road regardless of this development, which may have the beneficial effect of slowing down vehicles towards which the development will be expected to contribute. As part of master planning of developments the Council would seek to encourage development layouts or off-site improvements that increase the attractiveness of walking and cycling to schools and therefore reduce the impact of vehicular trips.</p> <p>The Preferred Options proposal for 150 homes would have required an access from Dunmow Road. For a number of reasons the site is now reduced in size and will deliver 50 homes. Land is no longer being made available that would have facilitated this northern access. Therefore the site will need to be accessed through two access points off Manor Links. It is anticipated that the larger site will come forward through a review of the District Plan, at which point, it will become necessary to provide an access from Dunmow Road.</p>

Issue Number	Issues raised through consultation	Officer Response
5.131	Site is too far from the town centre for walking and cycling. More than encouragement is necessary. Footpaths too narrow, will put pedestrian lives at risk. Not practical to get people to use buses. No cycle paths in the area.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Of the available options this site is one of the best related to the town and passenger transport. The centre of the site is approximately 1.5km from the town centre, which can take between 15 and 25 minutes to walk. There are also a number of bus routes which run along Dunmow Road and Parsonage Lane. Planning obligations could be sought towards the improvement of sustainable transport modes in the vicinity of the site, which could include footpath widening and crossing points where necessary.</p>
5.132	Concerns about affordable housing leading to unacceptable behaviour towards the local residents when trying to navigate access through Manor Links.	<p><b>No amendment to Plan in response to this issue</b></p> <p>It is unclear why provision for affordable housing should lead to unacceptable behaviour towards local residents. This is not substantiated.</p>
5.133	Not enough local services to support new resident's needs. Issues cited include health care and education in particular.	<p><b>No amendment to Plan in response to this issue</b></p> <p>These issues have been taken into account. There is an ongoing programme looking at the provision of healthcare services across the town. There are a number of planned extensions to existing schools and new schools being planned to accommodate pupils arising from the existing population and new developments.</p>
5.134	There are protected species present on the site.	<p><b>No amendment to Plan in response to this issue</b></p> <p>These issues will be addressed through detailed site investigation and a programme of mitigation if required.</p>
5.135	Density and quantum is too high. Will not fit the character of the area.	<p><b>No amendment to Plan in response to this issue</b></p> <p>There is a variety of building styles, density and design within the locality. Matters of design will be resolved as the Plan progresses and an application for the site is submitted. The developer has presented an alternative proposal for only 50 homes on a smaller area of land. It is the Officers' view that this smaller quantum is appropriate for the site.</p>
5.136	Emergency services will not be able to access the road. Road is too narrow to service the road particularly through construction phase.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Emergency services are able to access Manor Links currently. There is no reason why this situation would change. It is a normal requirement that construction vehicles are stored on-site and not on the adjacent roads. A temporary access from Dunmow Road to the north of the site to serve the construction phase has been assessed, but was not considered suitable by the County Council. Manor Links and the two access roads are considered suitable in terms of access by large vehicles such as refuse freighters and emergency service vehicles.</p>
5.137	Will increase vehicles travelling to town, exacerbating the congestion at Hockerill.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Of the available options this site is one of the best related to the town and passenger transport. The centre of</p>



Issue Number	Issues raised through consultation	Officer Response
		the site is approximately 1.5km from the town centre, which can take between 15 and 25 minutes to walk. There are also a number of bus routes which run along Dunmow Road and Parsonage Lane. Planning obligations could be sought towards the improvement of sustainable transport modes in the vicinity of the site. Transport modelling undertaken for the site indicates that the additional vehicle trips generated by this site would have a minimal impact on the level of congestion and length of waiting time at the Hockerill Lights.
5.138	Norris Close is a private road and was never meant for access by non-residents. Concern that given the poor footpaths along Dunmow Road, Norris Close and Brooke Gardens could be used as a cut-through to the town centre. If the development goes ahead then gates would have to be installed at the expense of the developer or Council.	<p><b>No amendment to Plan in response to this issue</b></p> <p>It is understood that the cut-through is currently used by residents of Manor Links, indicating a local desire to walk to the town centre. It is unclear what if any level of disturbance this causes currently or is anticipated. In the absence of any evidence these concerns are considered to be unfounded.</p>
5.139	Weston Homes commented that the area between Shortcroft and the Club House, including the latter's current car park and landscaping, should be included within the development site, albeit with an additional provision in the policy that apart from the access road and any realignment of the Golf Club car park and access road, the area in question should not be developed, in particular for housing.	<p><b>Proposed amendment to Plan</b></p> <p>Since the consultation when this comment was made, the situation with regards to land availability and the preference of the landowner has changed. The Preferred Options proposal for 150 homes would have required an access from Dunmow Road. For a number of reasons the site is now reduced in size and will deliver 50 homes. Land is no longer being made available that would have facilitated this northern access. Therefore the site will need to be accessed through two access points off Manor Links. The Plan will be amended to allocate the land now available.</p>
5.140	Weston Homes comments that this is too ambiguous in its reference to primary and secondary access. County highway policy allows around 100 dwellings to be accessed from a non-through residential road network, and therefore e) should specify that up to 50 dwellings within the BISH6 site can be accessed from Manor Links, with the remainder requiring an additional access via Dunmow Road.	<p><b>Proposed amendment to Plan</b></p> <p>It is the officers' view that a development of only 50 homes will be delivered on this site, meaning that all the properties could be accessed from Manor Links without requiring access from Dunmow Road. The Plan will be amended to allocate the smaller area of land now available.</p>
5.141	Weston Homes comments that the eastern boundary of the development site could reasonably encroach slightly further into the golf club land in order to create a more logical and thus defensible new long term	<p><b>Proposed amendment to Plan</b></p> <p>The proposed amendments are sensible. However, the latest information presented to the Council from Weston Homes proposes only 50 homes with a different outer edge treatment. A new Green Belt boundary would have to be 'designed-in' to the scheme and be supported by a new site allocation boundary on the Policies Map. The alternative is to remove the golf course from the Green Belt, and redefining the boundary</p>

Issue Number	Issues raised through consultation	Officer Response
	Green Belt boundary (plan attached).	using clear features on the ground such as the tree belt to the south of the golf course and the M11.
5.142	More detail should be required on the proposal, including information on building height, access, density and type of affordable housing.	<p><b>Proposed amendment to Plan</b></p> <p>To be too prescriptive on such matters would not be appropriate as many of these issues are best determined through the detailed masterplanning stage and it is not considered necessary to replicate other parts of the Plan in this policy. However, the policy will be amended to set out some of the ambitions for the site with more clarity.</p>
5.143	Housing will reduce the value of existing homes.	<p><b>No amendment to Plan in response to this issue</b></p> <p>There is no evidence to suggest that, in the context of East Herts and the proposals advanced in the draft Plan, that development will have an adverse impact on existing property values.</p>
5.144	Construction will be highly disruptive, particularly for utilities which will need upgrading.	<p><b>No amendment to Plan in response to this issue</b></p> <p>There is always a temporary period of disruption through the construction of any development. The reduction of this site to 50 homes will minimise the construction phase considerably. Utility companies always endeavour to ensure that disruption to services for existing properties is kept to a minimum.</p>
5.145	The Bishop's Stortford Civic Federation objects to this site as noise from Stansted airport should rule out this area as unsuitable for residential development.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Recent changes to flightpath navigation systems have greatly reduced the area of land overflowed during take-off and landing. This is evidenced in the Stansted Airport Noise Exposure Contours report and regular Civil Aviation Authority reports. The land proposed lies outside the area of concern as defined by noise contour maps. The area is also outside flight safety zones.</p>
5.146	The site access goes through a designated wildlife site and should therefore be rejected.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The former wildlife site here has been recently surveyed by the Herts and Middlesex Wildlife Trust and subsequently delisted in the 2014 Ratification Report as the area meeting the criteria is too small to qualify for classification.</p>
5.147	Herts and Middlesex Wildlife Trust support point h) and i) of the draft policy. Tree planting and landscaping (provision 'd') should use native species appropriate to the ecology of the site. Although no longer recognised as a Wildlife Site, some features may exist with ecological value and if lost should be mitigated/compensated to ensure no net loss to	<p><b>Proposed amendment to Plan</b></p> <p>Noted, however this is a general requirement rather than specific to this site, and is already addressed in the Natural Environment Chapter of the District Plan. The policy will be amended to make more emphasis on protecting the ecology of the site through mitigation measures and to ensure there is a net gain to biodiversity.</p>

Issue Number	Issues raised through consultation	Officer Response
	biodiversity.	
5.148	Hertfordshire County Council comments that impact of a development of 150 residential dwellings on land east of Manor Links has been assessed in the Harlow and Stansted Gateway Transportation Model and no particular transport issues have been identified, beyond local access issues that would be dealt with as part of a planning application.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Noted. While a smaller quantum is now being presented to the Council it is important that the full potential impacts of the larger site were assessed in highway terms. This quantum of development has also been assessed through the VISUM model being undertaken by Essex County Council, which raises the issue of the need for major improvements to junction 8 of the M11. The impacts of this site are too small to be noticeable on the model. If the remainder of the site is re-proposed in the future, a more up-to-date assessment of the impact of development will be required to take account of other changes in the town.</p>
5.149	Thames Water has concerns specifically that the sewerage network in the area is unlikely to be able to support the demand anticipated from the development. It will be necessary to investigate possible impacts of the development. It should be noted that in the event of an upgrade to Thames Water assets being required, up to three years' lead in time will be necessary. Thames Water asks that the following paragraph is included in the Development Plan: "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."	<p><b>No amendment to Plan in response to this issue</b></p> <p>Correspondence between Thames Water and Weston Homes dated December 2014 confirms that there are reasonable engineering solutions. As a smaller quantum of development is now being proposed the required mitigation measures will be less, however these measures should be future-proofed to accommodate the larger site if this was to come forward at a later date.</p> <p>The suggested amendments from Thames Water are more general in nature and are applicable to all forms of development, not just the strategic allocations presented in the emerging District Plan. It is therefore proposed that this is included in Policy DPS4 Infrastructure requirements.</p>
5.150	Tree planting – there are already some mature trees/hedgerows on this site – Tree Preservation Orders (TPOs) should be put in place before the developers begin work.	<p><b>No amendment to Plan in response to this issue</b></p> <p>A tree survey will be undertaken prior to determination of any planning applications in order to ensure that TPOs are designated where appropriate.</p>

Issue Number	Issues raised through consultation	Officer Response
5.151	General objection to the inclusion of this site as an allocation. Issues cited include Green Belt, added congestion, impact on character of town and previous dismissal by a Planning Inspector of the school relocation proposals. The application for the combination of two secondary schools south of Whittington Way was previously rejected on Green Belt grounds. Therefore development should not occur here for residential purposes for the same reasons. Object that the plan runs counter to the Council's arguments (as supported by the Planning inspector and Secretary of State) on Green Belt south of Whittington Way.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The appeal related to the policy context provided in the 2007 Local Plan. Plan-making requirements relate to the next 15 years. The NPPF requires local planning authorities to meet their objectively assessed need for homes and to identify a rolling five-year supply of suitable, available and deliverable land for development. Decisions on removing land from the Green Belt now have to be taken in this new context. Whilst these were not considered to outweigh the harm to the Green Belt in the previous policy context, there are some positives from bringing this land forward for development which include facilitating the relocation and expansion of the Bishop's Stortford High School including the provision of new sports facilities with community access.</p>
5.152	Lack of infrastructure to support development to the south of the town. Will cause further congestion through the town as vehicles would all use town centre road network. Other issues cited include social and community infrastructure such as health care facilities.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The development will be required to meet infrastructure needs arising from the site, through the provision of facilities on-site and the contribution towards the enhancement of facilities off-site.</p> <p>The site was assessed through the Strategic Sites Delivery Study, which indicated that the site offers the potential to contribute to more sustainable travel within the town, is in an accessible location and should prioritise walking, cycling and public transport connections in the development of a masterplan.</p>
5.153	Hertfordshire County Council welcomes and supports the flexibility in this policy, which is required to ensure that there is capacity to provide sufficient secondary school places within the town towards the end of the plan period and beyond. Accordingly the County Council wish to be involved in the Supplementary Planning Document (SPD).	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted. It is considered that it is appropriate to undertake a form of collaborative masterplanning for the site which would form the basis of an SPD.</p>
5.154	Hertfordshire County Council support Part I (h) and Part I (n) of this policy.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted.</p>
5.155	Countryside Properties supports the inclusion of this site in the District Plan and commit to a collaborative masterplan approach to address detailed urban design and masterplanning matters in a Supplementary Planning Document (SPD).	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted. It is considered that it is appropriate to undertake a form of collaborative masterplanning for the site which would form the basis of an SPD.</p>

Issue Number	Issues raised through consultation	Officer Response
5.156	<p>Countryside Properties supports the allocation and states that there should be scope to provide between 750 and 1,000 homes as well as a new public space alongside the existing route of the Hertfordshire Way, and a 4-5 ha business park. A promotional brochure is submitted [Note: this has been added to the Council's website at <a href="http://www.eastherts.gov.uk/developerinfo">www.eastherts.gov.uk/developerinfo</a>]</p> <p>Countryside Properties however requests that the words "depending on whether or not the need for a new secondary school has been demonstrated by the local education authority" after "a potential new secondary school" in bullet h) be deleted.</p>	<p><b>No amendment to Plan in response to this issue</b></p> <p>The latest information presented by the County Council indicates that the proposed schools to be provided as part of the Bishop's Stortford North site will meet the peak yield arising from that development and accommodate some of the existing education needs arising from the town. A development of 750 homes would generate 1.5 forms of entry, therefore a 2FE primary school should be provided through the development. In addition to this, the County Council has advised that a further two forms of entry are needed to serve the town. At secondary level the County Council has advised that a new secondary school is required. Both single sex schools (The Bishop's Stortford High School and Herts &amp; Essex High School) are on very constrained sites and are unable to accommodate expansion. The Herts &amp; Essex high School has plans to expand through the use of their off-site playing field at Beldams Lane. This will facilitate expansion on their current site by two forms of entry. In order for the Bishop's Stortford High School to expand it must relocate.</p> <p>In order to address immediate needs and to ensure options are available to serve future needs, land should be allocated for a 2FE primary school which could expand to 3FE. Land will also be allocated adjacent to the existing Thorley Hill Primary School site (which is currently co-located on the Bishop's Stortford High School) to facilitate expansion from 1FE to 2FE. Land will also be allocated for a new secondary school of at least 6FE with the potential to expand up to 8FE to accommodate future needs. How a secondary school is ultimately delivered (through land swap, academy purchase or relocation of an existing school) will be formalised through the masterplanning work, which will involve the County Council, the site promoter and relevant schools where necessary.</p>
5.157	<p>The site is an Area of Outstanding Natural Beauty, maintains air quality and semi-rural feel. Development will destroy rural approach to the town from the south. Object to the loss of the open land and sensitive landscape. Thorley is the southern approach to the town and plays a key role in preserving the pleasant visual aspect and distinctive setting for the market town of Bishop's Stortford which this site will jeopardise.</p>	<p><b>No amendment to Plan in response to this issue</b></p> <p>The area is not designated as an Area of Outstanding Natural Beauty. It is acknowledged that development in this area will result in a change in the character of the land. Careful masterplanning can minimise the visual impact of development and enhance the setting of development within the landscape context, thus ensuring a pleasant gateway to the town from the south.</p>
5.158	<p>Unrealistic to expect people to use public transport.</p>	<p><b>No amendment to Plan in response to this issue</b></p> <p>The site was assessed through the Strategic Sites Delivery Study, which indicated that the site offers the potential to contribute to more sustainable travel within the town, is in an accessible location and should priorities walking, cycling and public transport connections in the development of a masterplan. If these facilities are available from the start of occupation it will encourage the use of non-car based transport</p>

Issue Number	Issues raised through consultation	Officer Response
		choices.
5.159	Will add to congestion on A1184 and London Road as well as on the junction, all the way through to Harlow.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Paragraph 32 of the NPPF sets a high bar and does not allow Local Planning Authorities to refuse or prevent development unless the impacts are 'severe'. For the purposes of Plan-making in Hertfordshire, this is considered to be when traffic causes highway safety concerns. Essex County Council has undertaken transport modelling of the M11 corridor as part of the wider housing market area evidence work and in particular to support the proposal for a new junction to serve the north of Harlow (Junction 7a). This modelling indicates that there will be a reduction of vehicles using the A120 and A1184 once Junction 7a is complete. There is no proposed access from the site on to London Road. Access is proposed from St James Way, Obrey Way and Whittington Way. Therefore there will no vehicles turning on to London Road apart from via the traffic light controlled Whittington Way junction.</p>
5.160	Site is in flight path of Stansted Airport. Permission for the previous schools relocation proposals was refused on aircraft noise and traffic congestion grounds. New homes should not be built under the flight path in area of high noise pollution.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The appeal decision did not refer to aircraft noise or traffic congestion as significant factors. Aircraft noise was addressed in the reports of the Secretary of State and the Planning Inspector on the Secondary Schools appeal in September 2012. These concluded that <i>"the proposed relocation of the Bishop's Stortford High School (BSHS) and Hertfordshire and Essex High School (HEHS) to the Whittington Way site would not result in an unacceptable noise environment either within the proposed school buildings or at outside teaching spaces"</i>. The available noise contours show that no part of the site lies within either the 57 or 60 decibel areas, the latter being commonly associated with areas in which noise is 'noticeable and disruptive', and in which residential development should be avoided. Whilst noise may be intrusive, as indeed it is for many existing communities, it is not considered disruptive. The southern part of the site nearest these contours is proposed for a Business Park, in which noise concerns are less significant than for educational or residential uses.</p>
5.161	Sport England objects to the omission of reference to the need to provide for sporting facilities. If a new secondary school is provided on the site this would provide the most realistic opportunity for providing indoor sports facility provision. Criterion h) should be amended to include indoor and outdoor sports provision in the list of social infrastructure to be provided.	<p><b>Proposed amendment to Plan</b></p> <p>Agreed. The policy will be amended to refer to the provision of indoor and outdoor sports facilities, which is likely to be delivered as part of a community use agreement of facilities on the secondary school.</p>

Issue Number	Issues raised through consultation	Officer Response
5.162	<p>Bishop's Stortford Civic Federation objects to development in this location in terms of harm to the Green Belt. Reference is made to the Whittington Way schools appeal decision and the Inspector's conclusions on the current Local Plan (adopted 2007), both of which dismissed the notion of a school in the Green Belt location south of Whittington Way.</p> <p>East Herts Council refused permission for the schools proposals, citing harm to the Green Belt. Development would undermine all of the principles of Green Belt.</p> <p>In combination with proposals in the plan for development in Sawbridgeworth and Gilston and Uttlesford's proposals to the north, this would create a ribbon of development from Harlow to Elsenham, contrary to Green Belt protections.</p>	<p><b>No amendment to Plan in response to this issue</b></p> <p>The previous school application and subsequent appeal related to the 2007 Local Plan. The decision-making context relevant when the application was undertaken was different to the Plan-making context being proposed now. At the time of the application, the land to the south of Whittington Way was in the Green Belt with no plans to amend the Green Belt boundary. The Development Strategy chapter sets out the current planning context which requires the release of land from the Green Belt to facilitate meeting the District's objectively assessed needs in the most sustainable pattern of development. Land to the south of Whittington Way will be allocated for a residential-led mixed use development to facilitate not only new homes, but the relocation and expansion of a secondary school, the provision of a primary school, employment land and other community facilities.</p> <p>Development of Bishop's Stortford South would leave a substantial gap between Sawbridgeworth and the south of the town and will not result in the coalescence of settlements in this corridor.</p>
5.163	<p>The Bishop's Stortford Civic Federation objects to the impact on the Hertfordshire Way, as referred to by the Inspector in his appeal decision on the schools application.</p>	<p><b>Proposed amendment to Plan</b></p> <p>This has been looked at as part of the overall balance of considerations. It is the view of Officers that suitable design measures can be employed on the site to ensure that the setting of the Hertfordshire Way is protected. The Inspector's appeal decision related to a specific application in the context of the 2007 Local Plan. The policy will be amended however, to make specific reference to the requirement to protect and enhance the Hertfordshire Way.</p>
5.164	<p>Bishop's Stortford Civic Federation objects that the timing of the proposed development – simultaneously with Bishop's Stortford North and the Henderson town centre development – would cause disruption across the town.</p>	<p><b>No amendment to Plan in response to this issue</b></p> <p>The majority of the proposed development sites are accessible to the strategic road network reducing the need for construction traffic to enter the town itself. The Plan sets out the proposed phasing and delivery of development. However, other matters can delay development which are beyond the control of the local planning authority.</p>
5.165	<p>Support for the development provided it provides a range of homes, including affordable housing, mitigation on the local highway network, provides quality green infrastructure, architecture and landscaping.</p>	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted.</p>



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5.166	Thorley Parish Council objects to this site because of the impacts on Pig Lane, a narrow winding lane subject to flooding, used as a rat run between the A1184 and Hallingbury Road. Rat running from the site would also affect Beldams Lane, Haymeads Lane and Little Hallingbury. Close Pig Lane at the railway bridge to prevent rat-running. Should consider the creation of a new junction on the M11 joining London Road (south-eastern bypass), joining the A1184/B1383 junction.	<p><b>No amendment to Plan in response to this issue</b></p> <p>There is no evidence to suggest that development on this site will increase vehicle movements along Pig Lane where the unsuitability of these roads for through- traffic is acknowledged. Access along Pig Lane is already constrained at the London Road end by traffic light control at a narrow bridge over the railway line. A bypass around the south-east of the town would divert some traffic movements from the town centre, but may actually draw in a greater volume of traffic from the strategic road network on to the bypass. The cost of a bypass in this area would be considerable given the environmental constraints of the railway line, the river Stort and its floodplain and designated wildlife assets. It is understood that while the south-eastern bypass is included in the long list of the 2050 Vision there is no evidence that this infrastructure would be delivered within the Plan period.</p>
5.167	Thorley Parish Council objects that the site is an area of Grade 2 agricultural land.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Council has taken account of Agricultural Land Classifications through its assessments and has sought to use areas of poorer quality land in preference to that of a higher quality. In this instance it is considered that the need for housing, new schools, and economic development outweigh any harm that results from the loss of agricultural land.</p>
5.168	Thorley Parish Council comments that the site lies within Thorley Parish, not within Bishop's Stortford. It is requested that this site be deleted from the District Plan.	<p><b>No amendment to Plan in response to this issue</b></p> <p>It is acknowledged that the site lies within Thorley Parish. There are several instances across the District, where development on the edge of a town lies partially or wholly within a Parish. This in itself is not a reason to discount a development option.</p>
5.169	Thorley Parish Council is concerned about flood risk. There is an underground stream that runs from the west to the east of the site (i.e. Obrey way to Thorley Street). It follows the path of "the Valleys", coming out at Thorley Wash Cottage and then goes under the road to "The Glade". The back side of Thorley Wash Cottage is in the flood plain. Building on the flood plain will increase the flood risk to existing properties, even allowing for the use of flood resilient techniques.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Matters of flooding have been considered as part of the Environmental Impact Scoping Opinion Request made by the site promoter. The Council's response indicated that there are suitable measures that can be integrated into the overall design of the site to manage surface water, including the use of swales and filtration beds. As the site is within the drainage catchment of the Thorley Washes Wildlife Site and Thorley Flood Pound Site of Special scientific Interest (SSSI), measures to manage surface water drainage need to ensure that there is no adverse impact on water quality. A Strategic Flood Risk Assessment has been undertaken for the site, which identifies areas a small area of land at risk of surface water flooding. However, the SFRA indicates that the flood risk can be mitigated through design principles.</p>
5.170	Thorley Parish Council requests that an air quality survey is carried out to see if the air pollution levels are currently above World Air Pollution accepted levels.	<p><b>No amendment to Plan in response to this issue</b></p> <p>An air quality monitoring station (diffusion tube) was located on London Road until recently but this was moved to the Sawbridgeworth Air Quality Management Area because the reading indicated low levels of pollution. The emerging Environmental Quality policies require major developments to undertake an air</p>



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		quality impact assessment and to ensure such matters are addressed. On-site features such as street trees and enhancements to green infrastructure assets will also help to mitigate impacts to air quality.
5.171	Thorley Parish Council requests that a land survey is undertaken due to an area of sand behind houses in Thorley Street.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The area south of Bishop's Stortford lies within the Hertfordshire Sand and Gravel Belt and as such will be expected to consult with Hertfordshire County Council as to the potential presence of mineral reserves within the site and whether the prior extraction of any mineral is required or is indeed viable. Initial discussion with the Minerals and Waste Team suggest that the site is too small to warrant extraction of minerals. The County Council consultation response (see Issue 177) stated this site is located outside the sand and gravel belt and not located within a mineral resources block. There may be an opportunity to extract resources for use on site during development. Further clarification will therefore be needed.</p>
5.172	<p>Contradiction between the 'guiding principles' and the actual plan:</p> <p>e.g. Guiding principle 3: to promote 'self-containment', conflicts with this site, which is far from the town and other transport systems.</p>	<p><b>No amendment to Plan in response to this issue</b></p> <p>The area has good potential to contribute to self-containment objectives given that the site will provide a wide variety of uses on the site, thus reducing the need to travel for some day-to-day needs. The site is also considered to be well located in terms of connecting to existing bus networks and creating new services to link the site to the town centre. The guiding principles relate not just to individual sites or settlements, but also relate to wider geographies such as housing or economic market areas.</p>
5.173	<p>Bishop's Stortford High School supports the proposed designation of part of this site for education. At present some local children are ferried outside the town and indeed the County due to lack of capacity. The Boys' school suffers from dilapidated buildings, and the school was originally built for 3 Forms of Entry (FE) but has 5.3FE students currently. Considers that the deficit of places is nearer to 12FE across the town.</p> <p>20 ha should be provided to enable sufficient space for secondary education to 2031 and beyond plus for the town and incorporate a primary school and the Blues Nursery, currently located on the High School Site.</p>	<p><b>Proposed amendment to Plan</b></p> <p>It is the view of Officers that a secondary school for up to eight forms of entry should be provided as part of the development, in addition to a primary school of at least two forms of entry at primary level with the ability to expand to three forms of entry to accommodate future needs. The policy will therefore be amended to reflect this requirement.</p> <p>It is anticipated that this provision will facilitate the relocation and expansion of The Bishop's Stortford High School from their current site off London Road. It is also anticipated that The Blues Nursery could also be relocated, although additional Early Years provision may be required in addition to the existing nursery. Discussions are currently ongoing with the County Council School Planning Team, the site promoter and the School to agree an appropriate relocation strategy.</p>
5.174	Thorley is a Category 3 village and therefore should not have 750 to 1,000 homes allocated to it.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The village of Thorley remains as a group 3 village. The proposed development is not within the village of Thorley, although it is acknowledged that the site lies within Thorley Parish. There are several instances across the District, where development on the edge of a town lies partially or wholly within a Parish. This in</p>

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		itself is not a reason to discount a development option.
5.175	Question the accuracy of the conclusions of the Green Belt Review 2013 in relation to the site.	<p><b>No amendment to Plan in response to this issue</b></p> <p>An independent review of the Green Belt has recently been undertaken by Peter Brett Associates. Undertaken in 2015, this Review therefore supersedes the 2013 Review.</p>
5.176	The Herts and Middlesex Wildlife Trust and Natural England comment that any potential impacts on Thorley Flood Pound SSSI will need to be investigated and any adverse impacts will need to be appropriately mitigated and managed. This may include impacts associated with increased recreational pressure and dog walking. Contributions may be appropriate towards enhancement and ongoing management of Thorley wash to mitigate or compensate for any adverse impacts. Green infrastructure should be planned into the development. HMWT support points c) and i) in particular.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The relationship between the site and designated wildlife assets has been considered as part of the Environmental Impact Scoping Opinion Request made by the site promoter. The Council's response indicated that there are suitable measures that can be integrated into the overall design of the site to manage surface water, including the use of swales and filtration beds. As the site is within the drainage catchment of the Thorley Washes Wildlife Site and Thorley Flood Pound Site of Special scientific Interest (SSSI), measures to manage surface water drainage need to ensure that there is no adverse impact on water quality. These features can have serve multiple purposes, including being part of an area of open space.</p> <p>The issue of recreational pressure is more difficult to manage as such sites draw visitors from a reasonably broad catchment and therefore it is unlikely that negative impacts can be attributed to any one particular development. However, the proposed site will be expected to provide open spaces within the site, thus reducing the demands on the designated wildlife assets for day-to-day recreational purposes such as for dog walking or short walks.</p>
5.177	Hertfordshire County Council comments that this site is located outside the sand and gravel belt and not located within a mineral resources block. There may be an opportunity to extract resources for use on site during development.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Noted. The area south of Bishop's Stortford lies within the Hertfordshire Sand and Gravel Belt and as such the site promoter will be expected to consult with Hertfordshire County Council as to the potential presence of mineral reserves within the site and whether the prior extraction of any mineral is required or is indeed viable. Initial discussions with the Minerals and Waste Team that have occurred since the consultation suggest that the site is too small to warrant extraction of minerals. Further clarification will therefore be needed.</p>
5.178	Hertfordshire County Council comments that a 1,000 home option was tested in the HSGTM, which indicated that the development would lead to significant increases in congestion, therefore options for highways improvements need to be investigated and outline mitigation measures developed for the London Road, between Pig Lane and Thorley Hill, London Road/Stansted Road (north south corridor), South Street/Newton Road/Station Road junction/Parsonage	<p><b>Proposed amendment to Plan</b></p> <p>Deliverability Assessment considered these issues and indicates that congestion is not a legitimate reason to discount development, unless this congestion causes 'severe' impacts. For the purposes of Plan-making in Hertfordshire, this is considered to be when traffic causes highway safety concerns. Alternative means of transport such as bus and cycle routes should be prioritised and a number of other measures taken to encourage trips to be made to the town centre by other than private vehicles.</p> <p>Information from the County Council suggests that there are no means of improving the Hockerill junction apart from 'switching-off' right-hand turns, which has been considered in the past. Previous modelling</p>

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	Lane junction and Hockerill Junction. Due to constraints, a strategy to reduce the impact on Hockerill junction may be required, and consideration of the impacts on bus services will be needed.	indicated that this intervention would have other negative effects on the network if undertaken in isolation. However, this option can be reconsidered in the context of wider transport strategies now being assessed as part of the Bishop's Stortford Town Centre Planning Framework. These will be strategic interventions towards which all developments across the town will be expected to contribute, and as such will be include in the Infrastructure Delivery Plan. East Herts will continue to work the County Council on this issue.
5.179	Town Centre cannot cope with additional shopper's vehicles.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Bishop's Stortford Town Centre Planning Framework will consider a number of options that could alleviate traffic issues in the town. The issue of parking in the town centre is not easily resolved. Some respondents suggest more parking is required to support the vitality of the town, which has the negative effect of encouraging vehicles in to the town centre. Some respondent suggest that there are too many vehicles in the town already. Movement strategies for constrained historic towns such as Bishop's Stortford in the future will focus on encouraging a shift towards the use of alternative means of transport such as buses, walking and cycling.</p>
5.180	Not enough jobs to serve the new residents.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The site proposes 5 hectares of employment, which will provide some local employment opportunities. Bishop's Stortford is the District's principle town centre and is home to many businesses. The town's main economic strengths lie in its location; its proximity to Stansted Airport, access to the M11, proximity to Harlow and fast train routes into London and Cambridge. However this accessibility also makes the town ideal for commuters travelling to these larger centres for employment and other purposes. It should be noted that the town also attracts workers from outside the town. Therefore while there is a high level of movement of employees in to and out of the town this is to be expected. The main issues arising from this is on the highway and public transport network, rather than the fact not all workers work within the town. When calculating the number of homes needed, this takes into account the expected growth in jobs and a need to ensure sufficient workers are available to fill these jobs.</p>
5.181	Support for Harlow North as an alternative to developing around Bishop's Stortford.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Previous work on demographic forecasts indicated that not all of Bishop's Stortford's housing needs could be met within the proposed allocations and therefore some of the residual need would need to be met in other locations such as within the Gilston Area development. However, the Gilston Area is not expected to deliver homes until towards the middle to end of the Plan period and as such will not address the more immediate housing needs of Bishop's Stortford.</p>
5.182	English Heritage wishes to see a requirement within the policy that the development will protect and enhance the setting of the adjacent listed buildings on	<p><b>Proposed amendment to Plan</b></p> <p>Agreed, the policy will be amended to include reference to the protection and enhancement to the setting of</p>

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	London Road.	the listed buildings located on London Road or in the vicinity of the site.
5.183	The Green Belt boundary should be redefined along the bypass, removing land between the B183 to Southern Country Park from the Green Belt. Alternatively, the boundary should be drawn along Thorley Lane East, facilitating development of land to the north of Thorley Lane East.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The urban edge of the 1980s developments of Michael's Mead and Thorley Park is a clear Green Belt boundary, marking the boundary between the built-up area and the open land at Southern Country Park. The majority of properties in Thorley Lane East form part of the early history of Thorley village, which is now separated from Thorley Lane by the southern distributor road St James Way. The Green Belt in this location retains a clear distinction between the 1980s estate of Michael's Mead and Thorley Park the historic open character of The Old Rectory which forms a gateway to Thorley village.</p>
5.184	The Herts and Essex High School supports the plan for a secondary school site in this location, however the proposed 17ha is too small and this should be increased to 20 to 22ha.	<p><b>Proposed amendment to Plan</b></p> <p>Support noted. Discussions will continue to ascertain the appropriate amount of land required to facilitate the various education facilities proposed for the site. This will be specified within the policy.</p>
5.185	Thames Water has concerns specifically that the sewerage network in the area is unlikely to be able to support the demand anticipated from the development. It will be necessary to investigate possible impacts of the development. It should be noted that in the event of an upgrade to Thames Water assets being required, up to three years' lead in time will be necessary. Thames Water asks that the following paragraph is included in the Development Plan: "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."	<p><b>Proposed amendment to Plan</b></p> <p>These comments have been reiterated in the response to the Environmental Impact Scoping Opinion Request by the site promoters. The suggested amendments from Thames Water are more general in nature and are applicable to all forms of development, not just the strategic allocations presented in the emerging District Plan. It is therefore proposed that this is included in Policy DPS4 Infrastructure requirements. It is understood that the site promoters have undertaken to ensure these issues are fully resolved. However, the policy will be amended to refer specifically to waste water infrastructure being required in collaboration with Thames Water.</p>
<b>North of Bishop's Stortford</b>		
5.186	Hertfordshire County Council support Part I (a), Part II (a) and Part IV (m) and (n) of this policy. New primary and secondary provision have now been secured to	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted.</p>

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	meet the needs of the development.	
5.187	Hertfordshire County Council state that green infrastructure should be added to the policy, enhancing biodiversity, incorporating landscaping, rural character and a new country park.	<p><b>Proposed amendment to Plan</b></p> <p>The policy will be amended to be more specific in relation to the green infrastructure required on the site.</p>
5.188	Objection to the additional roundabout on the A120 as it will increase diversion of traffic from the town onto the bypass which is at capacity. Assessment needs to be undertaken of diversion from M11 through the town.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The impact of the roundabout on the A120 was assessed through the planning application. Traffic is better placed on the strategic road network than within the more constrained town centre roads. Traffic modelling undertaken for the wider housing market area work and the County Council's COMET model indicate that when traffic diverts from the M11, for example in the case of accidents or road closure, the A120 and A1184 are the preferred routes rather than town centre roads.</p>
5.189	Sport England objects that the policy omits reference to the need to provide indoor and outdoor sports facilities as part of the social infrastructure required to support the development. A suitable planning policy is required to provide guidance in the event that the current planning applications are not implemented or approved. Explicit reference should be made in criterion h), reflecting the deficiencies in the town noted in paragraph 5.6.3 of the plan. If a secondary school is provided this should have a dual-use agreement to secure public access to sports facilities.	<p><b>Proposed amendment to Plan</b></p> <p>Agreed. Since the Preferred Options consultation outline permission has been granted for the site, with detailed matters included for the first phase. The application was considered to make suitable arrangements for the provision of facilities on-site and made a significant financial contribution towards off-site facilities. In order to ensure there is a policy in place to guide the remainder of the development, the policy will remain with some amendment, which could include reference to specific provision of indoor and outdoor sports facilities. These are likely to be delivered through a range of means, including as part of a community use agreement of facilities on the secondary school.</p>
5.190	New Homes Bonus funding should be used to ensure adequate social and community infrastructure is provided in the town.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Agreed. This is the role of New Homes Bonus. Further discussions may be required between the receiving authorities (County Council, District Council and Town Council) to determine where projects exist that may be best served by pooling New Homes Bonus contributions.</p>
5.191	Amend policy to reflect the conditions imposed on the application to pause development after the completion of ASRs 1 and 2 in the event that the traffic congestion impacts turn out to be significantly less favourable than the developers have predicted.	<p><b>Proposed amendment to Plan</b></p> <p>It is proposed to add a new policy within the Delivery chapter that addresses ongoing monitoring of developments, particularly large sites which will take several years to complete. As this will be applicable to several sites, reference will be made where relevant to the new monitoring policy. This policy will not pause or prevent development but will introduce mutually agreed triggers for the monitoring of impacts when they</p>

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		are previously unforeseen.
5.192	Support for the inclusion of the allocation in the Plan to address undersupply of new properties to address housing need.	<b>No amendment to Plan in response to this issue</b> Support noted.
5.193	<p>Policy should be amended to reflect the form of development which the Council has resolved to approve:</p> <ol style="list-style-type: none"> <li>1. The quantum of dwellings proposed at Bishop's Stortford North is up to 2,200 dwellings (plus ASR5)</li> <li>2. The split of housing between the Western and Eastern neighbourhood is respectively about 850 and 1,350 dwellings (plus ASR5);</li> <li>3. The types of other development and community facilities ought to reflect the 'approved' parameters plans;</li> <li>4. No bus service is planned along Dane O'Coys Road</li> <li>5. Removal of reference to the Neighbourhood Plan which did not exist when the resolutions to grant planning permission were passed by the Council</li> </ol> <p>No need for a Supplementary Planning Document since all the land will have permission. Key Diagram should be amended to show the location of the secondary school. Plan should also reference the application details of ASR5.</p>	<p><b>Proposed amendment to Plan</b></p> <p>The site has outline planning permission for the whole site covered by ASRs 1-4 plus detailed permission for phase 1 (ASRs 1 and 2). However, it is considered appropriate to maintain a policy within the Plan which sets out the Council's preferences for the site moving forward to guide the remaining detailed permission or if amendments are sought.</p> <p>Outline permission has been granted for the ASR5 and the Council has just received a detailed application for the reserved matters. However, it is considered appropriate for the policy to set out the Council's preferences for this site in the same way as for the other ASRs.</p>
5.194	ASRs were reserved to serve airport related housing needs only, not to meet the needs of the Country.	<p><b>No amendment to Plan in response to this issue</b></p> <p>A significant part of the land at BSN has been identified in the Council's Local Plan (the East Herts Local Plan, Second Review, April 2007) as safeguarded land available for future development. These sites are identified as Areas of Special Restraint 1-5 (ASRs 1-5) and a Special Countryside Area (SCA). The Council resolved in 2008 that as a result of a deficiency in the 5 year supply of housing land required across the district and by Government policy, development proposals should be brought forward for all the ASR and SCA sites. The designation of the land in this way reflects its identification in earlier planning policy documents, including in versions of the East of England Plan and the Hertfordshire Structure Plan. The potential for development to take place at the site has been identified in some way for a considerable number</p>

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		of years.
5.195	Green area within the bypass is a great asset.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Noted. The policy requires the retention and enhancement of green infrastructure assets throughout the site and the creation of a new Country Park including Hoggate's Wood and Ash Grove.</p>
5.196	Hertfordshire Ecology and Herts and Middlesex Wildlife Trust support IV c), d), g), and h). an integrated green infrastructure/habitat network plan should be drawn up covering the whole site. Country Park proposals should ensure a balance between meeting the needs of wildlife and people and be maintained through an appropriate long-term mechanism. Fanham Bourne should be protected from adverse impacts through suitable buffering and habitats should be restored and enhanced and water quality improved where necessary in line with the River Catchment Management Plan.	<p><b>Proposed amendment to Plan</b></p> <p>Agreed. The policy will be amended to make specific reference to particular green infrastructure assets such as Fanham Bourne and make reference to the River Stort Catchment Management Plan.</p>
5.197	Hertfordshire County Council states that the site abuts the sand and gravel belt, therefore there may be the opportunity to extract resources for use on site.	<p><b>Proposed amendment to Plan</b></p> <p>The area north of Bishop's Stortford lies outside the Hertfordshire Sand and Gravel Belt. However, as with all the strategic sites, Officers consider it is appropriate to include a policy which requires the applicant to explore whether there are minerals present that may need to be extracted prior to development or be used during the construction process. This will be contained in the Natural Environment chapter.</p>
5.198	Modelling work undertaken in association with the application identified the need for off-site highway capacity improvements at the A120 junctions with the A1250 and B1383, along with a new bus route. The Smarter Choices programme should be used to reduce traffic flows into the town centre. Consideration should be given to the impact of traffic on air quality.	<p><b>Proposed amendment to Plan</b></p> <p>The policy will be amended to be more specific about measures to encourage non-car based travel and to reduce air quality impacts arising from development.</p>
5.198	Local Areas for Play and Local Equipped Areas for Play, along with proper sports pitches in line with Sport England guidance should be included in the policy.	<p><b>Proposed amendment to Plan</b></p> <p>The policy will be amended to be more specific about requiring the provision of play spaces as part of open space networks to be delivered on the site.</p>

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5.199	Bishop's Stortford Town Council comments that that policy should recognise the Neighbourhood Plan for Silverleys and Meads Wards.	<p><b>Proposed amendment to Plan</b></p> <p>The Neighbourhood Plan was not adopted when the original applications were determined. However, now the Neighbourhood Plan is adopted, it is appropriate to make reference to it where appropriate.</p>
5.200	English Heritage wishes to see a requirement within the policy that the development will protect, conserve and enhance the listed buildings within, and adjacent to, the site and their settings. In particular, long views of St Michael's Church and All Saints, Hockerill and views of mature trees.	<p><b>Proposed amendment to Plan</b></p> <p>Agreed. The policy will be amended to include reference to protecting, conserving and enhancing the setting of listed buildings within and adjacent to the site, maintaining key views of local landmarks.</p>
5.201	Representation on land adjacent to Bournebrook House, Farnham Road, supporting the inclusion of the ASRs in the Plan, seeking flexibility and assurance that this does not prejudice the planning process for smaller parcels of the land if necessary by a separate landowner.	<p><b>Proposed amendment to Plan</b></p> <p>Where a strategic allocation is made it will be supported by a specific policy in addition to the Development Management policies. It is anticipated that smaller applications may come forward on parts of the strategic sites. In order to ensure the ambitions and expectations of the strategic site are met, partial development will be expected to meet the same policy provisions. This is why the strategic sites will be supported by a comprehensively prepared masterplan against which applications will be considered. A new criterion will be added to the policy along the lines of: 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.</p>
5.202	Thames Water has concerns specifically that the sewerage network in the area is unlikely to be able to support the demand anticipated from the development. It will be necessary to investigate possible impacts of the development. It should be noted that in the event of an upgrade to Thames Water assets being required, up to three years' lead in time will be necessary. Thames Water asks that the following paragraph is included in the Development Plan: "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to	<p><b>No amendment to Plan in response to this issue</b></p> <p>Waste water matters have been addressed as part of the planning permission granted on the site.</p> <p>The suggested amendments from Thames Water are more general in nature and are applicable to all forms of development, not just the strategic allocations presented in the emerging District Plan. It is therefore proposed that this is included in Policy DPS4 Infrastructure requirements.</p>



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	overloading of existing waste water infrastructure.”	
<b>Off-Site Infrastructure</b>		
5.203	Hertfordshire County Council support the policy, however, they note that reference to the provision of a sixth form college should be removed as these facilities are provided within secondary schools.	<p><b>Proposed amendment to Plan</b></p> <p>Agreed. This part of the policy should be deleted. However it should be noted that Officers recommend the removal of this policy as it is no longer required. Policy DPS4 Infrastructure Planning in the Development Strategy chapter deals with strategic infrastructure and the Infrastructure Delivery Plan will provide the evidence required to support planning obligations throughout the Plan period.</p>
5.204	A full assessment of infrastructure needs should be undertaken.	<p><b>No amendment to Plan in response to this issue</b></p> <p>This is a key part of the plan-making process and is documented in the Settlement Appraisals supporting the District Plan.</p>
5.205	Outdoor playing fields, football pitches in particular, should be provided. Cricket and rugby grounds are also required.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Council is currently undertaking a Leisure Strategy which will be underpinned by an emerging Open Space, Sport and Recreation Assessment. This will provide an up-to-date position on the requirements of the town and identify ways of managing these demands. Two new secondary school grounds will include outdoor pitches for a variety of sports and access to these will be secured through Community Use Agreements.</p>
5.206	Widening the Station Road bridge will not alleviate traffic. Hockerill lights are the pinchpoint, not the bridge, which can only be resolved by diverting the traffic along another route.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The widening of the Station Road bridge is not primarily for the purpose of alleviating traffic. The emerging Bishop's Stortford Town Centre Planning Framework suggests a number of options for the bridge, which include widening the bridge to facilitate cycle routes and footpath connections which lead to a revitalised frontage of the leisure centre, making more effective and active usage of the river frontage.</p>
5.207	Enhancing the rail station as a transport hub will encourage more vehicles into the area.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The improvement of the transport hub is to facilitate the interchange between forms of public transport such as buses and trains. This will help improve the reliability of bus services encouraging more usage of the network. The quantum, operation and cost of station parking are the main determining factors in terms of encouraging more vehicles in to the area, which then have to navigate around the one way system to access the station car park.</p>
5.208	Construct a south-east bypass to connect to the M11 directly. Completion of the south-eastern bypass should be added to this policy, as a precondition for	<p><b>No amendment to Plan in response to this issue</b></p> <p>It is not reasonable to demand a south-eastern bypass as a precondition for development. A bypass would divert some traffic movements from the town, but may actually draw in a greater volume of traffic from the</p>

Issue Number	Issues raised through consultation	Officer Response
	any further development in the town.	strategic road network on to the bypass. The cost of a bypass in this area would be considerable given the environmental constraints of the railway line, the river Stort and its floodplain and designated wildlife assets. It is understood that while the south-eastern bypass is included in the long list of the 2050 Vision there is no evidence that this infrastructure would be delivered within the Plan period.
5.209	Infrastructure should be properly planned for, pre-designed and constructed, not addressed in a piecemeal fashion. The list is not sufficient nor proactive and visionary enough.	<p><b>Proposed amendment to Plan</b></p> <p>It should be noted that Officers recommend the removal of this policy as it is no longer required. Policy DPS4 Infrastructure Planning in the Development Strategy chapter deals with strategic infrastructure and the Infrastructure Delivery Plan (IDP) will provide the evidence required to support planning obligations throughout the Plan period. The IDP includes a range of infrastructure projects required to address cumulative and direct impacts. Specific infrastructure necessary to mitigate direct impacts associated with development will also be addressed in the site allocation policies.</p>
5.210	The Bishop's Stortford Civic Federation states that a proper car parking strategy for the town is required, including reduction in long-stay car parking spaces to make a Park and Ride scheme viable. Ely operates a P&R scheme on Saturdays so one should be planned for Bishop's Stortford. Commuters seek out spaces in residential roads. Controlled Parking Zones shift the problem to other locations. Need to adopt a different pricing policy to encourage long term stay parking out of the town centre. Other parking comments suggest building a multi-storey on parking north of Link Road with a pedestrian bridge across to the town centre redevelopment site. More short-term parking would make the town more attractive to shoppers.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Council is currently undertaking a review of parking within the town as part of the wider Bishop's Stortford Town Centre Planning Framework. This looks at a number of options which include the relocation of parking areas, the decking of car parks, the provision of new car parks and the improvement of access to existing car park areas.</p> <p>A Park and Ride has been tested on a number of occasions. For small towns such as Bishop's Stortford they are usually only viable where town centre parking is very limited, or where a policy decision has been taken to restrict it. Currently, the balance of considerations suggests that for Bishop's Stortford the disadvantages of restricting town centre parking outweigh the advantages of a Park and Ride. This may change in the future depending upon the decisions taken in relation to the Framework, and/or other policy considerations.</p> <p>These comments indicate that there is no single solution to resolving parking in Bishop's Stortford.</p>
5.211	Previous poor decisions have led to a lack of education facilities, lack of church schools in the town causing out commuting of pupils.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Noted. The Plan allocates land to facilitate the delivery of education facilities. The introduction of the Free Schools programme will facilitate opportunities for churches to provide church schools.</p>
5.212	More bus services should be provided particularly to serve secondary school facilities.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Plan already requires improvements to be made to bus networks. Where necessary, policies could be amended to make specific reference to bus routes serving school sites.</p>

Issue Number	Issues raised through consultation	Officer Response
5.213	Policy provides no flexibility or variation between different types of development, no guidance related to development thresholds (e.g. does it apply to a proposal for a single new house?), no indication of potential contributions figure or justification for this. Contrary to CIL Regulation 122 whereby financial contributions must be 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. Policy wording should be made more flexible to reflect these concerns.	<p><b>Proposed amendment to Plan</b></p> <p>It should be noted that Officers recommend the removal of this policy as it is no longer required. Policy DPS4 Infrastructure Planning in the Development Strategy chapter deals with strategic infrastructure and the Infrastructure Delivery Plan (IDP) will provide the evidence required to support planning obligations throughout the Plan period. The IDP includes a range of infrastructure projects required to address cumulative and direct impacts. Specific infrastructure necessary to mitigate direct impacts associated with development will also be addressed in the site allocation policies.</p>
5.214	The Bishop's Stortford Liberal Democrats request that Bishop's Stortford South should be deleted as a location for a secondary school.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Given the lack of available land within the town to provide such essential infrastructure, it is the view of Officers that this location provides a unique opportunity to fulfil the relocation and expansion needs of an existing school. However, this can only be facilitated through development.</p>
5.215	The Bishop's Stortford Liberal Democrats support the widening of Station Road bridge, and suggest adding the words "possibly by constructing a parallel pedestrian bridge".	<p><b>Proposed amendment to Plan</b></p> <p>The emerging Bishop's Stortford Town Centre Planning Framework suggests a number of options for the bridge, which include widening the bridge to facilitate cycle routes and footpath connections which lead to a revitalised frontage of the leisure centre, making more effective and active usage of the river frontage. These options will be considered and incorporated into the IDP.</p>
5.216	Bishop's Stortford Town Council states that relief at Hockerill lights can be achieved by interventions elsewhere. Reword policy as follows "measures (not necessarily in the immediate vicinity of the lights) which improve traffic movement and air quality at Hockerill lights."	<p><b>Proposed amendment to Plan</b></p> <p>It should be noted that Officers recommend the removal of this policy as it is no longer required. Policy DPS4 Infrastructure Planning in the Development Strategy chapter deals with strategic infrastructure and the Infrastructure Delivery Plan (IDP) will provide the evidence required to support planning obligations throughout the Plan period. The IDP includes a range of infrastructure projects required to address cumulative and direct impacts arising from development. As the policy is currently written, it did not specify any limitation on the distance from the lights where interventions could occur.</p>
5.217	Social and community infrastructure should be added to the list of infrastructure, including the provision of sporting facilities.	<p><b>No amendment to Plan in response to this issue</b></p> <p>A key objective of the Plan is that social and community infrastructure requirements will be addressed through on-site provision and therefore are listed in specific site allocation policies. It should be noted that Officers recommend the removal of this policy as it is no longer required, being managed instead through</p>

Issue Number	Issues raised through consultation	Officer Response
		Policy DPS4 Infrastructure Planning in the Development Strategy chapter.
5.218	The Bishop's Stortford Civic Federation states that it is essential that both the hub and the station car park can be accessed from the road network south of the town. At present, access to the bus station and car park is from the gyratory system north of the site. Because traffic from the south has to use it, congestion of the system and at Hockerill is considerably worse than it need be.	<p><b>Proposed amendment to Plan</b></p> <p>This junction is an identified Air Quality Management Area and is being considered as part of the Bishop's Stortford Planning Framework. Potential improvements to the road network in other parts of the town, as part of a wider strategy, will alleviate some congestion at this junction, such as the introduction of a bus route through the Goods Yard site and the potential 'switching-off' of the gyratory system. This issue is consistent with the views outlined by Hertfordshire County Council and will be reflected within the chapter. East Herts will continue to work the County Council on this issue.</p>
5.219	Stansted Airport Ltd is concerned about the cumulative impacts of proposed development on Junction 8 of the M11, taking into account the additional traffic that will be generated through the specific approved development of Stansted to 35million passengers per annum. It is vital that the Infrastructure Delivery Plan is progressed and consulted upon before submission of the District Plan so as to avoid unnecessary debate and objection.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Council is preparing an Infrastructure Delivery Plan, the first draft of which will be available to inform the Pre-Submission consultation period. The Council has been working closely with Essex County Council and Highways England to understand the impacts of development arising not just from Bishop's Stortford but from the wider housing market area (Epping Forest District, Harlow, East Herts District and Uttlesford District). The IDP proposes two scenarios for improvements at Junction 8; an interim improvement programme which provides capacity in the short term, and a longer term solution which will accommodate planned housing growth, primarily arising from the A120 corridor.</p>
<b>Employment in Bishop's Stortford</b>		
5.220	Bishop's Stortford Football Club objects to the failure to recognise the potential for various employment related uses to be located at the ground occupied by BSFC, either in conjunction with the club or in the medium term, as an alternative to occupation by the club.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The club's location adjacent to the M11 makes it an ideal location for employment land. This is indeed acknowledged in the Employment Study for Bishop's Stortford. However, until such time as the football club is able to secure alternative premises the Council does not wish to jeopardise the continued use of the site for football purposes.</p>
5.221	Section needs more detail about the type of employment opportunities that will be created in the town. Should aim to attract employers to reduce out commuting to London and Cambridge. A science park should be provided. Concern about the town being a dormitory for out-commuting with such residents not supporting the town centre economy. Where will new residents work?	<p><b>No amendment to Plan in response to this issue</b></p> <p>A 5 hectare business park is proposed at Bishop's Stortford South and the Council is in discussion with Uttlesford District Council to explore the release of land at Stansted Road to the north of the town from the Green Belt to facilitate expansion of the employment land adjacent to the A120.</p> <p>The town benefits from being within the London-Stansted-Cambridge Corridor, where there is a lot of positivity around the creation of new business and job opportunities. Given the town's location and connections to major employment areas such as Stansted Airport, Cambridge, Harlow and London, there will</p>

Issue Number	Issues raised through consultation	Officer Response
		always be a high level of commuting out of the town, though interestingly, there is also a high level of commuting in to Bishop's Stortford as well. The Bishop's Stortford Town-Wide Employment Study (2013) contains further background evidence.
<b>Retail in Bishop's Stortford</b>		
5.222	The market is not sufficient.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The role of markets in town centres is acknowledged in the Plan and the town benefits from a twice weekly market plus monthly farmers market. The Council continually seeks to ensure that the market is competitive and attractive both to visitors and to prospective sellers. This Council is working closely with the Town Council in its role of managing the markets in the town.</p>
5.223	Local roads should be re-routed to prevent unnecessary circulatory vehicle movements.	<p><b>No amendment to Plan in response to this issue</b></p> <p>This is being considered as part of the Bishop's Stortford Planning Framework. Potential improvements to the road network across the town, as part of a wider strategy, will reduce the amount of vehicles navigating around the town in search of parking. Such options include the introduction of a bus route through the Goods Yard site and the potential 'switching-off' of the gyratory system. East Herts will continue to work the County Council on this issue.</p>
5.224	The Council should do more to encourage retailers into the town centre and prevent closures.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Planning policies seek to ensure the town centre environment is attractive to retailers. Revised retail policies provide more flexibility than in previous plans and the Council is keen to prevent closures where possible. One of the roles of the Bishop's Stortford Town Centre Planning Framework is to look at ways of attracting retailers to the town centre.</p>
5.225	The inclusion of the Mill Site within the town centre boundary is supported.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted</p>
5.226	BISH11 seeks to focus retail development within the Old River Lane site, but this would undermine other opportunities throughout the town of providing viable retail offers. This is also contrary to RTC1. Silver Spoon (owner of the Allinson Flour Mill) objects to this because it conflicts with Policy RTC1 and has the potential to undermine the delivery of retail and leisure facilities in suitable locations within the town centre.	<p><b>Proposed amendment to Plan</b></p> <p>The policies for Bishop's Stortford sites will be amended to make more reference to the opportunity presented by the Goods Yard and Mill Sites in creating a retail and leisure circuit through the town to towards the station. The Old River Lane Site is an ideal location to provide new retail and leisure opportunities. Revised retail policies provide more flexibility than in previous plans and there is nothing to suggest that where retail proposals come forward in other parts of the town centre that these will not be considered suitable subject to meeting the provisions of the retail policies. Policy BISH11 will be revised to refer to other opportunities within the town.</p>

Issue Number	Issues raised through consultation	Officer Response
5.227	Bishop's Stortford Civic Federation request that Bishop's Stortford South should be deleted from the identified neighbourhood centres list.	<p><b>No amendment to Plan in response to this issue</b></p> <p>A key requirement when planning for new communities is the inclusion of a neighbourhood centre providing for day-to-day retail and service needs. This should therefore be included in policy.</p>
5.228	Bishop's Stortford Town Council comments that the retail circuit includes a route through the Mill site which is unlikely, according to statements made elsewhere in the plan, to be practical. The alternative route is along the river joining it at station Road. This would require the construction of a new access ramp which could conveniently be done at the same time Station Road is widened (BISH9). This should be included as part of the circuit and the requirement in BISH9.	<p><b>Proposed amendment to Plan</b></p> <p>The retail circuit diagram will be amended to reflect guidance in the emerging Bishop's Stortford Town centre Planning Framework, which considers the provision of new retail and leisure opportunities at the Mill Site among other locations. Therefore while the diagram could be made to be more indicative, the principle of connecting this site to the town centre through attractive and direct routes will be retained in the policy.</p>
5.229	Waitrose supports the inclusion of its store within the Primary Shopping Area, but continues to have concerns about the impact which the masterplan and off-site basement car park would have on the store's attraction and turnover.	<p><b>No amendment to Plan in response to this issue</b></p> <p>As landowners of the site, the Council will not be progressing with the planning permission previously granted for the site under Henderson's ownership. The Council is currently preparing with consultants a Town centre Planning Framework which considers ways in which the Old River Lane site could be developed in the future.</p>
<b>Leisure and Community Facilities in Bishop's Stortford</b>		
5.230	Hertfordshire County Council raise the importance of ensuring there are adequate education facilities to support planned growth.	<p><b>Proposed amendment to Plan</b></p> <p>The Plan will allocate land to facilitate the provision of new and expanded schools in the town and will continue to work with the County Council to ensure that opportunities are available to assist the County Council to undertake its role as the authority responsible.</p>
5.231	Hertfordshire County Council states that it would be prudent to provide a 2FE reserve primary school site within the town, as there is limited capacity for existing schools to expand. The timing of developments are key in terms of ensuring the timely delivery of new school places.	<p><b>Proposed amendment to Plan</b></p> <p>The plan requires a 2FE primary school site within Bishop's Stortford South to serve the needs arising from that development with a sufficient site area to enable expansion up to 3FE to accommodate future needs. In addition to the two new primary school sites already granted planning permission within Bishop's Stortford North development, Officers propose to allocate additional land adjacent to Thorley Primary school to facilitate expansion up to 3FE.</p>
5.232	The enclosure of Hillmead Primary School and St Joseph's Catholic Primary School within the town boundary would make them easier to expand to	<p><b>No amendment to Plan in response to this issue</b></p> <p>These schools lie within the green wedge to the west of the town, which are currently within the Green Belt. It is the view of Officers that the Green Wedges in Bishop's Stortford are a key part of the character of the</p>

Issue Number	Issues raised through consultation	Officer Response
	accommodate growth.	town, providing valuable multi-functional open land which also serves to separate neighbourhoods. Therefore it is not proposed to remove this land from the Green Belt. While there is no amendment proposed to the Bishop's Stortford chapter, amendments to Policy GBR1 (Green Belt) sets out how the Council proposes to manage school sites within the Green Belt to enable their expansion where it is required.
5.234	Hertfordshire County states that the deliverability of options to expand the existing secondary schools is uncertain, as the County Council has no power to require the schools to expand or to change their admissions arrangements. HCC is seeking 6FE of secondary provision within Bishop's Stortford North to enable development to provide appropriate education infrastructure for that new community, which equates to 5FE together with the provision of an additional 1FE to ensure demand from the existing community across the planning area can be met.	<p><b>Proposed amendment to Plan</b></p> <p>Planning permission has now been granted for a 6FE secondary school within Bishop's Stortford North. The amended Bishop's Stortford North policy will reference this. In addition, the existing Hadham Road Reserve Secondary school Site will be retained to provide a fall-back position, should the second detailed phase of Bishop's Stortford North not come forward. In addition, Officers are working with the County Council, the site promoters and the Bishop's Stortford High School to address the school's relocation and expansion through the development to the south of Whittington Way. Officers are also working with the Herts and Essex High School in their plans to expand onto their Beldams Lane site. Thus longer term demands from the community will be addressed.</p>
5.235	Schools import demand from neighbouring towns.	<p><b>No amendment to Plan in response to this issue</b></p> <p>It should be noted that there is also movement of pupils outside of the town. As local growth occurs, this has the effect of reducing the catchment of schools, thus reducing the number of children coming from neighbouring settlements.</p>
5.236	Lunar Retail SARL, the long leaseholders of the Bishop's Stortford Leisure Complex suggest that a policy for the site should be introduced, to retain the core leisure function but to enable some flexibility. In particular, the operational issues to be addressed include: addressing the lack of dedicated car parking; making site more attractive and prominent and, in particular, making better use of the site's location adjacent to the River Stort; seeking to establish the best balance of complementary leisure uses on the site; and investigating the potential for the introduction of additional non-leisure uses, for example residential and/or hotel use. Given the range of issues and the importance of the site to the town, emerging policy	<p><b>Proposed amendment to Plan</b></p> <p>Agreed. It is proposed to introduce new policy on leisure and recreation which will address these issues. This is in line with the advice emerging from the Bishop's Stortford Town Centre Planning Framework. The importance of the leisure complex could be amplified by public realm improvements along the river frontage and across the river itself.</p>

Issue Number	Issues raised through consultation	Officer Response
	does not provide an appropriate policy framework.	
5.237	Residential development must be supported by investment in recreation facilities. The town has a deficit of football pitches, rugby pitches, cricket pitches and other indoor and outdoor leisure facilities. Concerned that provision should be made for both the Bishop's Stortford Community Football Club and the Swifts. Unfair that the Swifts got a new ground when the needs of BSCFC are greater as it is a far larger club. No more housing until football pitches sorted. Bishop's Stortford Community Football Club want their own ground large enough to cater for its membership. There needs to be investment in changing facilities to encourage female participation.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Council is currently in the process of updating its evidence on open spaces, sport and recreation facilities. There is an existing deficit of outdoor pitches primarily due to the size of the Bishop's Stortford Community Football Club which caters for significant demand, making use of a large number of pitches in and around the town. The Bishop's Stortford North Sports Investment Strategy indicated that there are different ways in which the demands of the club can be met and the Council is working closely with Sport England, the Football Association, the club and other landowners to find a solution through the emerging open space assessment work. The provision for The Swifts at Bishop's Stortford North development was considered appropriate, as it would assist with meeting needs and is on a site which would not be sufficient to meet the needs of the Community Football Club, it would also enable the expansion of the rugby club as they and the Swifts currently share a ground.</p>
5.238	Insufficient healthcare facilities in the town to address existing demand without additional residents.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Council is working with the Clinical Care Commissioning group, NHS England and NHS Hertfordshire to address healthcare demands within the town. The policy for the development to the south of Whittington Way will require the provision for a healthcare unit within the neighbourhood centre.</p>
5.239	Grange Paddocks is inadequate to cater for demands.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Council is currently working on a new leisure strategy which will address these issues. Grange Paddocks is constrained by floodplain so the Council is discussing with the Environment Agency suitable ways of managing flood risk.</p>
5.240	Community centres need to be supported for their multiple benefits.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Policy CFLR7 and CFLR8 within the Community Facilities, Leisure and Recreation chapter seek to manage the creation of new, or loss of existing community facilities.</p>
5.241	New facilities for the practice of faith are not mentioned.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Policy CFLR7 and CFLR8 within the Community Facilities, Leisure and Recreation chapter seek to manage the creation of new, or loss of existing faith facilities.</p>
5.242	Insufficient indoor sports space should be addressed, options include new dedicated centre and provision of new sports halls as part of school developments which	<p><b>Proposed amendment to Plan</b></p> <p>The Council is currently working on a new leisure strategy which will address these issues. In addition, in order to address concerns by Sport England, it is proposed to specify the requirement to provide indoor</p>



Issue Number	Issues raised through consultation	Officer Response
	could be used by the community.	sports facilities as part of the creation of new or expansion of existing schools, which can then be managed through Community Use Agreements. Policies will be amended to add specific reference to indoor sports facilities.
5.243	The Bishop's Stortford Community Football Club request that their current ground be removed from the Green Belt.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Green Belt Review, whilst containing the football club land within Green Belt parcel 68, did not make specific mention of the football ground. Therefore Officers have considered the land against the same criteria and consider that the site does not function well as an area of Green Belt, being bounded by the strategic road network to the north, east and south and an employment area to the west. The club complex, whilst it could be argued represents an essential facility for outdoor sport, which could be deemed an appropriate use within the Green Belt, is very urban in nature, with significant hardstanding, multi-storey clubhouse building and stands, hoarding and floodlighting, features not conducive to a Green Belt location. Therefore it is proposed that the Green Belt boundary be amended to exclude the football ground and the land will be designated for open space, sport and recreation under the CFLR policies.</p>

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## EAST HERTS COUNCIL

### DISTRICT PLANNING EXECUTIVE PANEL – 8 SEPTEMBER 2016

#### REPORT BY LEADER OF THE COUNCIL

#### EAST HERTS DRAFT DISTRICT PLAN – BUNTINGFORD – SETTLEMENT APPRAISAL AND NEW DRAFT CHAPTER 6

WARD(S) AFFECTED: ALL

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

The purpose of this report is:

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

<b><u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:</b>	
<b>(A)</b>	<b>the Buntingford Settlement Appraisal as detailed at Essential Reference Paper ‘B’ to this report, be agreed; and</b>
<b>(B)</b>	<b>the draft revised Chapter 6 (Buntingford), 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.</b>

#### 1.0 Background

1.1 The Council published its Draft District Plan Preferred Options for consultation for a period of twelve weeks between 27<sup>th</sup> February and 22<sup>nd</sup> May 2014.

1.2 The issues raised through the consultation with regard to the Buntingford Chapter were considered at the District Planning Executive Panel on the 25<sup>th</sup> August 2016.

- 1.3 This report presents a Settlement Appraisal for Buntingford. 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 Buntingford 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 Buntingford that included two proposed allocations:
- Land to the south of the town, on land to the east of London Road for 300 dwellings; and
  - Land to the north of the town, on land to the west of Ermine Street for 180 dwellings.
- 2.2 However, 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 that have been submitted prior to the adoption of the District Plan. Since the Preferred Options District Plan was published in 2014, planning permission has been granted for the development of 1,035 dwellings on sites delivering 10+ units, with planning applications totalling an additional 480 dwellings awaiting determination.
- 2.3 The Settlement Appraisal identifies how the proposed strategy for the town has been refined following the Preferred Options consultation. As the proposed allocations to the north and south of the town have now received planning permission the revised draft chapter does not contain specific policies relating to these sites.
- 2.4 The Settlement Appraisal identifies that further development in excess of the level already permitted in the town is not viewed as being sustainable due to the likely increase in out-commuting from the town by car to access services, facilities and employment opportunities in nearby towns. Therefore the revised draft chapter does not propose any further site allocations for residential development.
- 2.5 The emerging strategy for the town in the District Plan is now

concerned with ensuring the cumulative impacts of development are managed appropriately, particularly through the provision of additional employment opportunities and education infrastructure. A site allocation has been made on land west of London Road for the provision of a new first school to meet the growing demand for school places forecast in the town.

2.6 The policies contained in the draft revised chapter set out what the proposed development in Buntingford 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 <sup>th</sup> February and 22 <sup>nd</sup> 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

### Buntingford

#### 1. History

- 1.1 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 Settlement Appraisal. In particular, Chapters 4 to 6 of the Supporting Document explained the process of shortlisting or 'sieving' options applied to 'Areas of Search' and their findings.
- 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 in Buntingford; land to the south of the town, on land to the east of London Road (300 dwellings) and land to the north of the town, on land to the west of Ermine Street (180 dwellings). In addition, an element of windfall development was attributed to Buntingford.

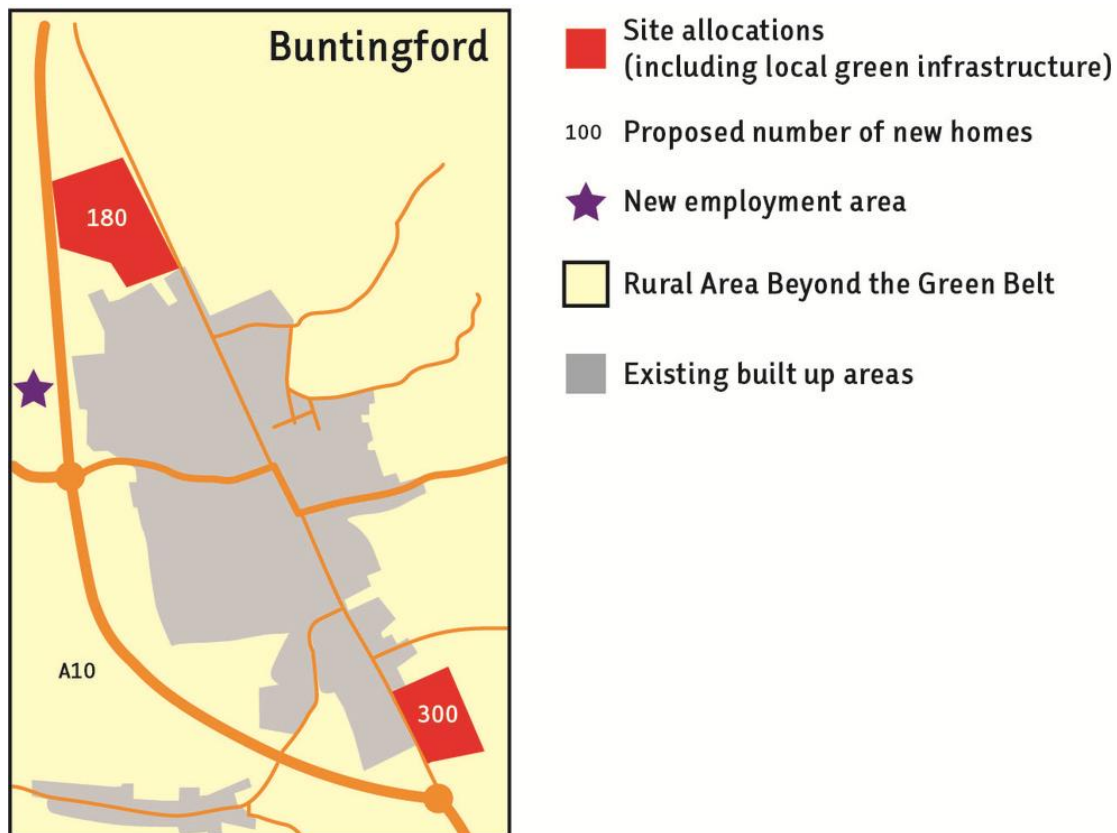


Figure 1: Preferred Options District Plan, Buntingford Key Diagram

## 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:

- Approval of speculative planning applications resulting in overdevelopment of the town and the impact on its overall sustainability;
- Infrastructure capacity (particularly education facilities, healthcare facilities and local road infrastructure);
- Lack of employment opportunities in the town;
- Lack of public transport links;
- Harm to the character of the town.

2.2 In responding to the Preferred Options consultation, Hertfordshire County Council indicated that it would be prudent to allocate a site for the provision of a first school to ensure that the long term need for school places can be met.

2.3 A couple of site promoters made representations specific to their sites and further consideration of the need to allocate additional sites for development is covered at appropriate points throughout the remainder of this document.

## 3. Planning Applications in Buntingford

3.1 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 that have been submitted prior to the adoption of the District Plan.

3.2 The table below sets out the major planning applications (sites of 10+ dwellings) that have been approved or are awaiting determination since the Preferred Options consultation document was published.

Table 1: Major planning applications approved/submitted since Preferred Options

Site	Description of development	Number of Dwellings	Status
Land north of Hare Street Road	Residential development of 160 dwellings	160	Approved on Appeal

Land south of Hare Street Road (Area 1)	Residential development of 105 dwellings	105	Approximately 100 dwellings approved on Appeal; 105 dwellings approved by Council through reserved matters application
Land north of Buntingford	Residential development of 180 dwellings	180	Approved by Council
Land north of Buntingford	Development of 25 retirement bungalows	25	Approved by Council
Land north of Buntingford	Development of 37 retirement apartments	37	Awaiting determination
Land south of Buntingford	Residential development of 316 dwellings and provision of 2ha of employment land	316	Approved by Council
Land north of Park Farm Industrial Estate	Residential development of 13 dwellings	13	Approved by Council
Land south of Hare Street Road (Areas 2 & 3)	Residential development up to 180 dwellings	180	Approved on Appeal
Land east of Aspenden Road	Residential development of up to 56 dwellings	56	Approved on Appeal
Land west of Luynes Rise	Residential development of up to 400 dwellings and site for First School	400	Awaiting determination
Land north of Park Farm Industrial Estate	Residential development of 43 dwellings	43	Awaiting determination

3.3 The table shows that since the Preferred Options District Plan was published, planning permission has been granted for 1,035 dwellings on sites delivering 10+ units (1,010 for general needs and 25 specialist retirement dwellings). In addition, planning applications totalling an additional 480 dwellings are awaiting determination (of which 37 are for specialist retirement dwellings).

3.4 Therefore the emerging development strategy for Buntingford to be included in the District Plan will need to take account of this updated position.

## 4. Technical Assessments

- 4.1 A number of technical assessments have been completed since the Preferred Options consultation, primarily to help inform the decision-making process relating to the relevant planning applications, but also to inform the overall plan-making process. Further technical assessments will be commissioned to inform the decision-making process with regard to planning applications as appropriate.

### Buntingford Employment Study

- 4.2 The Buntingford Employment Study, June 2014, was commissioned specifically in response to the planning application for the redevelopment of the former Sainsbury's Distribution Depot. In addition to providing specific information and recommendations about development of the site, the study also considered the likely growth in the resident population and workforce of the town until 2031, and considered the need to provide local employment opportunities and how these might be achieved.
- 4.3 The study established that a high proportion (74%) of residents of working age are economically active which suggests that the majority of residents who live in Buntingford, and would want to work, are able to find employment. In terms of the balance of workforce and jobs in the town, the available evidence implies that just 26% of economically active people who live in Buntingford, also work in the town. Whilst this self-containment ratio is low, the study states that it is important to note that the District as a whole has a low level of self-containment (45%), with East Herts being, in many senses, the rural hinterland of the major employment centres in the A1(M) and M11 corridors and in north and central London.
- 4.4 The study identified that there are currently around 1,300 jobs available in Buntingford and that an increase in the employed population of the town due to residential development proposals will increase the level of out-commuting from the town unless additional jobs are created in Buntingford. It is therefore considered desirable to grow the employment base of the town to increase the opportunities for people to live in Buntingford and work locally, which is particularly important for lower income, lower skill groups and for those who wish to work part-time.
- 4.5 The study examined the current supply of employment land in the town and this analysis indicated that there are relatively few vacant units within existing employment sites. In addition, the study assessed the capacity for the delivery of additional jobs through the development of increased

employment floorspace on the existing employment sites within the town and through the extension of the employment area at Buntingford Business Park. The study concluded that there is the potential to create approximately 1,110 jobs on existing employment sites within the town (including the retention of 2ha of employment land at the former Sainsbury's depot), and through the development of an additional 3 hectares of employment land at Buntingford Business Park.

- 4.6 The study calculated an increase in the employed population of the town of 1,236 people, based on the construction of all the development schemes that have received planning permission as of August 2016, indicating that even if the full capacity of 1,110 jobs were to be achieved on the existing employment sites in the town, this would not match the increased demand for employment from new residential development.
- 4.7 The study confirms that further residential development beyond that already committed without an accompanying growth in employment would increase the level of out-commuting from the town, further reducing the self-containment ratio of the town.

#### **Site Search for a Two Form of Entry First School Site in Buntingford**

- 4.8 The Site Search for a Two Form of Entry First School Site in Buntingford, June 2015, was undertaken by Herts County Council (HCC) to supplement their representations to the Preferred Options consultation in 2014, where it was suggested that it would be prudent to allocate a site for the provision of a first school to ensure that the long term need for school places can be met in the town.
- 4.9 The paper states how HCC produce pupil forecasts every six months and the forecast produced in mid-2014 identified that the surplus capacity previously identified at first school level had reduced significantly with a growing number of pre-school aged children living in the area identified from GP registration data.
- 4.10 The paper refers to a Buntingford Position Statement prepared in Autumn 2014 which took account of all approved and proposed housing development in the town and the impact that the provision of this amount of housing would have on the demand for school places in the school planning area. Housing growth of approximately 1,470 dwellings indicated a peak in pupil yield at first school level of around 3FE from 2024. The current potential for expansion at the two existing first school sites in the town has been assessed as being 1.5FE, which is equivalent to the development of

approximately 750 dwellings. Therefore the conclusion of the statement was that a new two form of entry (2FE) first school site would be required in the town should all the proposed development come forward.

4.11 The paper shortlisted three potential sites from an initial list of nine sites, which it was suggested should be considered further for the provision of a 2FE first school. These sites were:

- Former Sainsbury's Depot
- Buntingford Cougars FC
- Buntingford West

The study explains the reasons behind the shortlisting of these sites and concludes by requesting that Policy BUNT2 South of Buntingford is amended in the emerging District Plan to allocate a site for a new 2FE first school within the area identified for employment use.

### **Buntingford Transport Model Report**

4.12 The Buntingford Transport Model Report, August 2015, was commissioned to inform the consideration of the submitted planning applications and to inform the Plan-making process of the District Plan.

4.13 The work involved the creation of a VISSIM micro-stimulation model of the existing operation of the road network in and around Buntingford, which was then used to test various development scenarios (including both committed development and development proposals still under consideration), and determine any mitigation measures if required.

4.14 The results of the scenario testing indicated that, in the most part, the network can accommodate the new developments given the network changes that have already been planned through the approval of the various planning applications.

4.15 However, operational issues were identified at the following locations;

- A10/London Road – southbound in the AM peak, and northbound in the PM peak
- High Street/Baldock Road – northbound, principally in the AM peak

4.16 In terms of the A10/London Road roundabout, two mitigation measures were tested. The results showed that local widening of the two A10 exit links at the

roundabout (to provide a two-lane section before merging back to a single lane) provided a significant improvement in operation, particularly in the AM peak. The report suggested that this mitigation measure should be considered in the near future.

- 4.17 The report also highlighted an ongoing issue with the link capacity of the A10 between the London Road roundabout and the dual-carriageway section around 2km south of the town. The modelled scenarios that include the development of 400 dwellings to the west of Buntingford, result in the traffic demand on this section of the A10 being close to the link capacity during peak periods. Therefore, the second mitigation measure identified in the report is a longer term aspiration to extend the dual carriageway section up to the London Road roundabout.
- 4.18 The report highlights that mitigation measures such as junction improvements to address the operational issues identified at the High Street/Baldock Road junction are difficult to implement due to the surrounding streetscape in this location. However, the modelling indicates that if a new roundabout on the A10 is provided as part of the development of 400 homes to the west of Buntingford, traffic levels within the town centre will be reduced which will have a positive impact on the local road network.

## **Delivery Study**

- 4.19 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 Buntingford, it did test the financial viability of different site typologies. The study concluded that development schemes in the Buntingford 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. However, flatted developments and/or development on brownfield sites with abnormal or remediation costs may not be able to meet the full policy requirements of the District Plan and flexibility would be required when negotiating S106 or CIL financial contributions.

## **5. Duty to Co-operate**

- 5.1 Buntingford is located in the northern part of the District and development proposals in the town have limited cross-boundary issues. Nevertheless, the development proposals in the town have been the subject of Duty to Co-operate discussions with North Herts District Council with regard to the

relationship between Buntingford and Royston and the impact of development on traffic flow on the A10. In addition, extensive discussions have been held with Hertfordshire County Council regarding cross-boundary education issues as there is an identified flow of pupils from both North Herts and Stevenage into schools located in Buntingford.

## **6. Neighbourhood Planning**

- 6.1 Buntingford Town Council had an Area Designation approved in July 2014 in order to undertake a Neighbourhood Plan. The Neighbourhood Plan covers the town and five adjoining rural parishes and is referred to collectively as the Buntingford Community Area. The Neighbourhood Plan has been prepared in the context of the Local Plan 2007, although the policies have been drafted with a view to being in general conformity with the policies in the emerging District Plan. The independent examination of the Neighbourhood Plan is due to commence shortly. If the Plan is found to meet the basic conditions, the Plan will be put forward to a referendum and if the majority of voters are in favour of the Plan, the Neighbourhood Plan will be made and will form part of the statutory development plan for the District.
- 6.2 The Buntingford Community Area Neighbourhood Plan does not allocate any sites for development, but defines a settlement boundary for the town within which development will be permitted. In addition, the Plan contains policies relating to Business and Employment, Environment and Sustainability, Housing Development, Infrastructure, Leisure and Recreation and Transport.

## **7. The Emerging Strategy**

- 7.1 The development strategy for Buntingford has been largely shaped through the planning application process, in advance of the adoption of the District Plan. The amount of development proposed in the Preferred Options District Plan was for at least 493 dwellings and development in excess of this level (1,035 dwellings) has already been approved, with planning applications for a further 480 dwellings awaiting determination.
- 7.2 It should be noted that development of up to 2,000 dwellings in Buntingford has been tested through the plan-making process. The conclusion contained within Chapter 4 of the Supporting Document was that development of 2,000 dwellings in Buntingford would be out of scale with the capacity and function of the town, with limited mitigation measures identified, particularly with regard to the High Street/Town Centre, which performs the function of a Minor Town



Centre. Therefore, Chapter 4 stated that a lower level of development would be preferable with further work required to recommend a suitable figure.

- 7.3 Chapters 5 and 6 of the Supporting Document considered further the issue of a suitable figure for the level of development in the town. Assessment of economic development opportunities indicated that it would be necessary to expand both the retail offer and local employment opportunities within the town to meet the needs of an increasing population. Due to its location, businesses within and around Buntingford tend to have local links, serving the local area and rural hinterland around the town. Therefore, it was considered that the best employment strategy would be to seek to expand existing employment sites to provide small and medium units for local businesses, rather than to develop a large employment site, particularly one aimed at a single user. Transport modelling undertaken by the Highway Authority at that point indicated that development of approximately 500 dwellings could be accommodated within the highway network, with further modelling required to determine the impacts of a higher level of development. In addition, an assessment of the urban form of the town concluded that development of approximately 500 dwellings would be the appropriate scale of development to maintain a linear urban form, with development located to the north and south of the town respecting the valley setting of the town.
- 7.4 This evidence provided the justification for the development strategy proposed for the town in the Preferred Options District Plan. However, as stated in Section 3 above, since the Preferred Options District Plan was published, planning permission has been granted for 1,035 dwellings on sites delivering 10+ units, with issues regarding employment provision, highways capacity and urban form being considered through the planning application process.
- 7.5 The development strategy for the town, therefore, needs to reflect the updated position with regard to committed development proposals in Buntingford and, having regard to the evidence presented in the technical assessments, an updated conclusion as to what an appropriate and sustainable level of development would be for the town needs to be reached.
- 7.6 Buntingford is the smallest town in the District and currently has insufficient employment opportunities for the projected increase in the population of the town. The town has no railway station and is not well connected to nearby settlements by bus services. Therefore the town is a less sustainable location for development in comparison to sites in, or on the edge of, larger towns in the District that have a railway station and better public transport provision. Notwithstanding this, Buntingford does have a wide range of services and facilities serving the day-to day needs of both the residents of the town and its large rural hinterland. Therefore, the town is viewed as an appropriate and

sustainable location for a proportion of the development required to meet the District's housing requirement.

- 7.7 The NPPF (paragraphs 34) states that new development should be located where the need to travel can be minimised and the use of sustainable transport modes can be maximised. Despite the quality and range of services and facilities in Buntingford, they are not sufficient to sustain the local population, and it is inevitable that current and future residents of the town will travel to nearby larger towns, primarily by car, which is not viewed as an environmentally sustainable outcome.
- 7.8 Likewise, in terms of sustainable development it is, in principle, desirable that people should be able to live and work locally to minimise the time, cost and environmental impacts of their journey to work. However, opportunities for employment are currently lacking in the town. 2 hectares of employment land have been retained as part of the planning permission approved at land south of Buntingford and an allocation for 3 hectares of new employment land has been made at the Buntingford Business Park. The Buntingford Employment Study indicates that there is the potential to create approximately 1,110 jobs on these sites and through the development of increased employment floorspace on the other existing employment sites in the town (Park Farm and Watermill Industrial Estates).
- 7.9 The study calculated an increase in the employed population of the town of 1,236 people, based on the construction of all the development schemes that have received planning permission as of August 2016, indicating that even if the full capacity of 1,110 jobs were to be achieved on the existing employment sites in the town, this would not match the increased demand for employment from new residential development. It is considered that further residential development beyond that already approved without an accompanying growth in employment provision would lead to an increase in 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. Buntingford already has a low self-containment ratio of just 26% and it is considered that the development strategy for the town should seek to maintain and, if possible, improve this, with any growth in dwellings being matched by growth in employment opportunities.
- 7.10 Therefore, it is the view of Officers that significant development in excess of the figure already committed for development in the town would be out of scale with the form and function of the town, and cannot be viewed as being sustainable development.

- 7.11 Consequently, it is not proposed to allocate any additional sites in the Plan for residential development. The emerging strategy for the town in the District Plan is now concerned with ensuring the cumulative impacts of development are managed appropriately, particularly through the provision of additional employment opportunities and education infrastructure to ensure that the impacts of development in Buntingford are appropriately mitigated.
- 7.12 It is proposed to make amendments to the policies contained in the Preferred Options District Plan as set out below.

### **Policy BUNT2 South of Buntingford**

- 7.13 This site was included in the District Plan Preferred Options Consultation for the proposed delivery of 300 dwellings and the setting aside of a proportion of land for employment uses and to facilitate improvements to the Bury Football Club.
- 7.14 Since the 2014 Preferred Options consultation, planning permission for 316 dwellings has been approved and development has commenced on site. As part of the planning application process, outline planning permission has also been granted for 2 hectares of employment land on the southern part of the site, for development that falls within the Use Classes B1(a), B1(c) and/or D1.
- 7.15 As a result of the implementation of this planning permission, the majority of Policy BUNT2 becomes redundant and should be deleted from the District Plan. It is proposed that the 2 hectares of employment land retained on the site should be designated as an Employment Area, and referenced in Policy BUNT3 (previously numbered as BUNT4) Employment in Buntingford. The Bury Football Club grounds will remain outside the settlement boundary of the town and will continue to be protected by an 'Open Space, Sport and Recreation' policy designation (CFLR1).

### **Policy BUNT3 North of Buntingford**

- 7.16 This site was included in the District Plan Preferred Options Consultation for the proposed delivery of 180 dwellings and the setting aside of a proportion of land for employment and education uses and to facilitate improvements to Freman College.
- 7.17 Since the 2014 Preferred Options consultation, planning permission for 180 dwellings has been approved on the majority of the site and it is anticipated that a major housebuilder will commence development shortly. In addition, a

specialist retirement housing provider is seeking to bring forward the southern part of the site for the provision of retirement housing; 25 retirement bungalows have been approved and a planning application for 37 retirement apartments is awaiting determination.

- 7.18 Given that the planning position of this site is largely resolved and development is due to commence shortly, it is considered that there is no longer a need to include Policy BUNT3 in the Plan. The residential development areas of the site will be included in the settlement boundary of the town and the open space contained within the western part of the site will remain outside the settlement boundary of the town and be protected by an 'Open Space, Sport and Recreation' policy designation (CFLR1).

### **New Policy BUNT2 First School Site Allocation**

- 7.19 The Preferred Options version of the District Plan proposed a level of development in Buntingford where the pupil yield generated from new development could be met through the expansion of existing schools in the town. HCC have confirmed that the expansion potential of the existing first schools is 1.5FE which is equivalent to the development of approximately 750 dwellings. The appeal decisions received earlier in 2016 that granted approval to 236 dwellings at land south of Hare Street Road (Areas 2 and 3) and land to the east of Aspenden Road have resulted in the projected pupil yield from new developments exceeding the expansion capacity of the existing first schools in the town. Therefore, it is essential that a new first school is delivered within the first five years of the Plan to meet the increasing demand for school places.
- 7.20 As stated in paragraph 4.10 above, HCC have carried out a site search for a two form entry first school and have requested that Policy BUNT2 be amended in the emerging District Plan to allocate a site for a new school within the area identified for employment use. However, as stated in paragraph 7.9 above it is the view of Officers that this Policy be deleted in the forthcoming version of the Plan. As part of the approved planning application on this site, 2 hectares of employment land has been approved for B1(a)/B1(c) and/or D1 uses. It is Officer's understanding that the employment land (which is split across both sites of an access road into the site) has been/is in the process of being sold to two separate developers. One developer is proposing to build a care home on 0.62ha of the site and a planning application is awaiting determination, with the remainder of the site being proposed for mixed employment uses. Whilst the planning permission granted on the site permits D1 use (which includes education provision) on the land identified for employment uses, it is the view of Officers that

delivering a school on this site would now be unlikely given the value of the land with the extant planning permission for commercial development, and the landowner's intention to develop it for commercial purposes. In addition, provision of a school on the designated employment land would result in the full employment potential of the land not being maximised.

- 7.21 The site search paper identified two other potential sites for a new first school. The first of these sites is land at Buntingford West, which is currently the subject of a planning application for up to 400 dwellings and a first school site. However, the current application is proposed to be developed in phases with the first school to be delivered in Phase 2, which would not meet the timeline set out by HCC for when they need the new school to be opening.
- 7.22 The developer has indicated that it may be possible for the first school to be developed as part of Phase 1 but there are significant outstanding issues relating to this proposal with regard to accessing the school site (which is located at a distance from Phase 1 of the development and the proposed access route) and how the access to the school would be financed. In addition, there is an outstanding objection from the Highway Authority to accessing the school through the existing residential development (from Luynes Rise). Therefore, the current position is that vehicular access to the proposed school site would need to be provided by the construction of a new roundabout on the A10 and Officers have significant concerns about the viability of delivering this roundabout as part of Phase 1 of the development. Even if these issues were to be resolved, HCC would, to some extent, be dependent upon the developer for delivery of the school, with regard to the timetable of implementation of the scheme.
- 7.23 The proposed school site at Buntingford West is also located in close proximity to one of the town's existing first schools, Millfield First & Nursery School, so delivery of a new school in this location would create a concentration of places in this area of the town. It is therefore not the preferred location of HCC for delivery of a first school. Given the outstanding issues relating to the planning application, the delivery of a first school within the timescale identified by HCC remains uncertain.
- 7.24 The final potential site identified by HCC for a new first school is the Buntingford Cougars FC site located to the west of London Road. The full extent of the land identified to the west of London Road (approximately 3 hectares) is understood to be in the ownership of three landowners, one of whom leases their land (approximately 1 hectare) to Buntingford Cougars FC. This part of the site, located on the southern boundary, is currently in use as a football pitch and is designated as a protected open space and recreation facility. The remainder of the site is partially covered by matures trees, with

hedgerows to the boundaries.

- 7.25 As part of the site search work, HCC contacted one of the landowners who indicated that they had no interest in bringing the site forward for development. However, two of the landowners have promoted their sites for development to the Council (through the Call for Sites and through representations to the Buntingford Community Area Neighbourhood Plan). Therefore it is considered that the site is available for development and given that the site is in a preferable location for the delivery of a new first school, due to its proximity to the new residential development being constructed to the east and south of the town, it is the view of Officers that the site should be allocated for the provision of a new first school in the District Plan, with dual use of recreation facilities for wider community activities. It is acknowledged that there remains a degree of uncertainty surrounding the delivery of a first school on this site, but it is felt that a site allocation within the District Plan provides HCC with a policy position to work with going forward to engage in further discussions with the relevant landowners. The entirety of the land to the west of London Road will be allocated for the provision of the school, despite the full extent of the site not being required, as HCC need to undertake further technical assessments and feasibility work to ascertain the exact amount of land required for the school and the preferred location within the site. The site will not be included in the settlement boundary of the town.

## **8. Consideration of Alternative Sites**

- 8.1 As part of the Plan-making process it would usually be necessary to consider whether any available and suitable alternative options would be better placed to meet the level of development proposed to be delivered within a particular settlement. However, as explained in this appraisal, it is the view of Officers that the level of development for Buntingford proposed in the District Plan should be equal to that already committed in the town through the approval of recent planning applications. Therefore, it is not proposed to allocate any additional sites for development in Buntingford in the District Plan; as such, there is not the requirement to consider whether alternative sites would be better placed to meet the proposed level of development as this has already been reached.
- 8.2 However, it is important to make the distinction between the plan-making process and the decision-making process relating to the consideration of planning applications, in relation to alternative sites. The discussion and conclusions reached in this settlement appraisal with regard to Buntingford relate to the formulation of a sustainable development strategy for the District as a whole, through the plan-making process.

- 8.3 In an ideal situation, all the potential development sites around the town would have been considered through the process of preparing the District Plan, where the cumulative impacts of development could be properly assessed and mitigated where appropriate. However, this has not been the case and each planning application submitted in advance of the District Plan has been considered on its merits in accordance with the saved policies of the Local Plan 2007 and the NPPF. There are still outstanding planning applications awaiting determination that will also be considered in this context and potentially with regard to the policies contained in the emerging District Plan as they gain more weight in the decision-making process.

## **9. SA Objectives**

- 9.1 The Sustainability Appraisal is an integral part of Plan-making. As no further sites are being allocated for residential development in the town in addition to those which have already gained planning permission, the development strategy for Buntingford has been largely shaped in advance of the adoption of the District Plan and the impacts arising from development have been considered through the planning application process. Therefore, the development strategy for Buntingford will be assessed through the District-Wide Sustainability Appraisal.

## **10. Conclusion**

- 10.1 The Settlement Appraisal for Buntingford has demonstrated that, given the level of development already committed in Buntingford through the approval of speculative planning applications submitted in advance of the adoption of the District Plan, no further sites should be allocated for residential development in the town.
- 10.2 The Appraisal identifies that development in excess of the level already permitted cannot be viewed as being sustainable due to the likely increase in out-commuting from the town by car to access services, facilities and employment opportunities in nearby towns.
- 10.3 The emerging strategy for the town in the District Plan is now concerned with ensuring the cumulative impacts of development are managed appropriately, particularly through the provision of additional employment opportunities and education infrastructure to ensure that the impacts of development in Buntingford are appropriately mitigated. The 2ha of employment land retained

on the site south of Buntingford will be designated as an employment area and a site allocation has been made on land west of London Road for the provision of a new first school to meet the growing demand for places forecast in the town.

- 10.4 It is considered that this presents a positive and sustainable development strategy for Buntingford.



## Chapter 6 Buntingford

### 6.1 Introduction

- 6.1.1 Buntingford is a small town located at the centre of a large rural area in the northern half of the District. The town has developed in a valley setting astride the River Rib and the Roman Road Ermine Street and is surrounded by open countryside.
- 6.1.2 Being surrounded by an extensive rural hinterland enables Buntingford to function as an important rural service centre for the outlying villages in the north of the District. Despite its small size, the town has an extensive range of services and facilities that serve the day-to-day needs of residents, and a vibrant local community demonstrated by the numerous clubs and societies that are active in the town.
- 6.1.3 The historic core of the town, centred on the High Street, is an attractive location which supports local independent traders and a weekly market. The town is served by two small supermarkets but residents have to travel to larger nearby towns for comparison shopping trips. Buntingford is therefore regarded as a Minor Town Centre.
- 6.1.4 The medieval town centre lies within a Conservation Area, with the evolution of the town's urban form being influenced by its historical role as an important coaching stop on the route from London to York. The town has numerous buildings which are listed for their historical significance providing a visual record of the history of the town.
- 6.1.5 Buntingford is the only town in East Herts that is not served by a railway, and bus service connections to other settlements are limited, resulting in a reliance on the private car as a means of transport to access larger nearby settlements for employment and leisure purposes. However, this relative remoteness has enabled the town to retain its Market Town character.
- 6.1.6 As there has been some loss of employment in the town in recent years, it is important that the town should seek to maintain and improve on its current employment provision, in order to provide

local jobs for both existing and new residents of the town. Enhancements to the town's broadband infrastructure will support existing businesses in the town and help attract new businesses to locate in Buntingford.

- 6.1.7 As Buntingford is the only town in the District not constrained by Green Belt, it has been subject to a number of speculative planning applications in advance of the adoption of the District Plan. The development of approximately 1,100 dwellings has been approved across a number of sites in the town since 2011 and therefore, the development strategy for Buntingford is focused on seeking to ensure that the impacts of development can be mitigated and managed within the overall infrastructure of the town.
- 6.1.8 The main components of the development strategy for Buntingford are as follows:
- 6.1.9 **Housing:** additional homes will be provided which will consist of a mix of dwelling types and sizes, including bungalows and specialist retirement accommodation, to ensure that Buntingford's population is able to access a balanced housing market catering for all life stages. The provision of affordable housing as part of new residential and mixed use development schemes will allow emerging households to be able to remain living in Buntingford in accommodation suited to their needs.
- 6.1.10 **Education:** the town and surrounding villages are served by a three tier education system. Education provision at the upper level will be enhanced via the expansion of Freman College and the provision of new playing fields, which have been secured as part of the new development being constructed to the north of the town. At the middle tier, Edwinstree Middle School will be expanded to provide additional school places to meet the educational needs of the town and the surrounding villages at this level.
- 6.1.11 The educational needs of the town at the lowest tier, First Schools, will be met through the expansion of Millfield First and Nursery School to 2 forms of entry and through the provision of a new 2 form of entry First School in the town. Land to the west of

London Road has been allocated for this purpose. In addition, expansion of Layston C of E School may also be required.

- 6.1.12 **Transport:** as part of development proposals for the town, bus services will be enhanced to support travel around the town and to provide links to neighbouring towns. Financial contributions towards the implementation of a Community Transport project have been secured which will, once established, provide a valuable service to the residents of the town and neighbouring villages. New developments will encourage the use of sustainable travel modes through the enhancement of walking and cycling links around the town. The impact of development on the local road network will be mitigated through upgrades to existing junctions, including widening of the exit links at the A10/London Road roundabout.
- 6.1.13 **Other Infrastructure:** improvements to wastewater networks may be required to support existing and new developments whilst the broadband infrastructure of the town is due to be upgraded in 2017/18.
- 6.1.14 **Employment and Retail:** the large rural hinterland surrounding the town makes Buntingford an ideal base for small businesses that have links to the town itself rather than those that rely on a proximity to major road networks. Existing employment sites in Buntingford will be retained and, where appropriate, extended and modernised. 2 hectares of employment land has been retained through the redevelopment of the former Sainsbury's Depot site, and an additional 3 hectares of employment land has been allocated as an extension to the Buntingford Business Park.
- 6.1.15 The town centre of Buntingford will retain its role as a minor town centre with a secondary shopping frontage which will continue to function as an important service centre for its large rural hinterland, whilst retaining its market town characteristics. Economic and housing development will increase available expenditure to help support a good range of services including jobs, shopping, leisure and education, to meet the needs of residents of the town and surrounding villages.

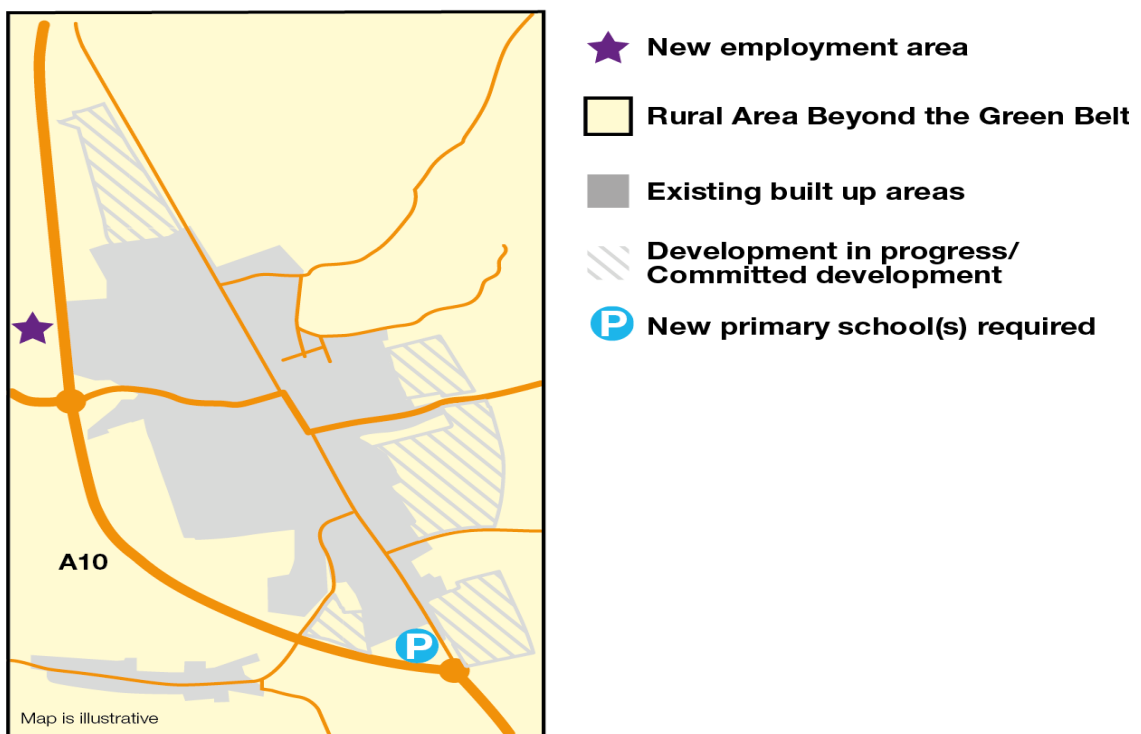
6.1.16 **Leisure and Community Facilities:** Buntingford's leisure facilities will be supplemented by the provision of new playing pitches and a large area of public open space as part of development to the north of the town. Public access to the countryside that surrounds the town will be maintained and enhanced. New burial space will be provided in the town.

6.1.17 **Character:** Buntingford will preserve its market town character and the quality of the town's historic core will be respected in new development proposals. Development to the north and south of the town will enhance primary routes into the town, providing a visual transition between rural and urban, and development to the east will be appropriately landscaped, respecting the valley landscape of the town.

**6.2 Development in Buntingford**

6.2.1 The main features of the policy approach to development in Buntingford are shown on Figure 6.1 below:

Figure 6.1 Buntingford Key Diagram



- 6.2.2 In recognition of the amount of development that has been approved in the town since 2011, no further site allocations for residential development are proposed as part of the District Plan Strategy. Therefore, the following policy will apply to applications for new development in Buntingford:

**Policy BUNT1 Development in Buntingford**

In accordance with Policy DPS3 (Housing Supply 2011-2033), development proposals will be permitted within the town boundary as defined on the Policies Map, which will include:

- (a) a proportion of the overall windfall allowance for the District.

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

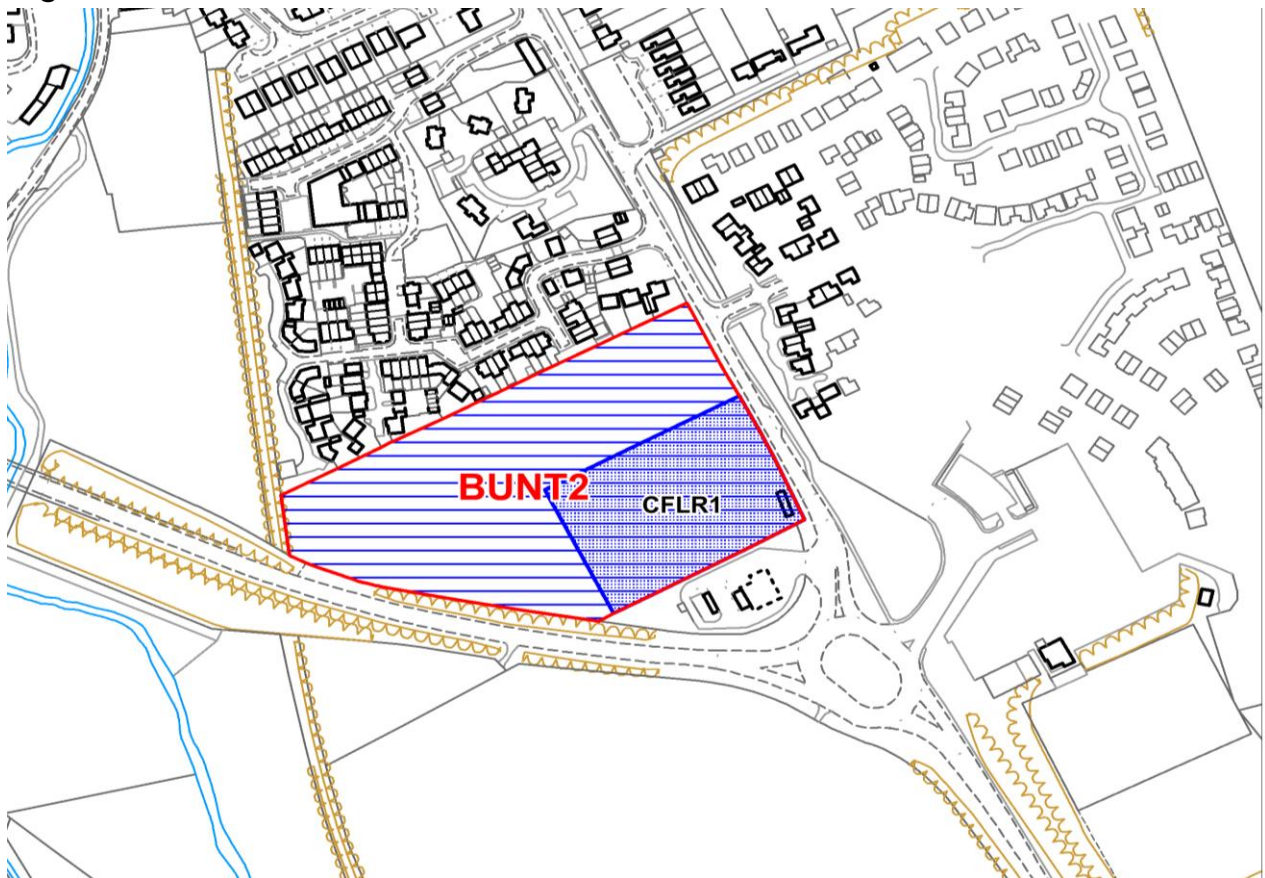
**First School Site Allocation**

- 6.2.4 Hertfordshire County Council, as Local Education Authority, is responsible for the planning of school places in the District, and have identified that a new 2 form of entry (2FE) First School is required in Buntingford.
- 6.2.5 Therefore, in order to meet the educational needs of the town, land west of London Road has been allocated for the provision of a 2FE First School.
- 6.2.6 HCC has indicated that a total site area of 1.4 hectares would be required for the provision of a 2FE First School. However, the whole of the site west of London Road (approximately 3.1 hectares) has been included in the site allocation, to allow more detailed feasibility work to be carried out to determine the most appropriate layout for the site.
- 6.2.7 Approximately 1 hectare of the site is protected by an 'Open Space, Sport and Recreation' policy designation (CFLR1). This designation covers a football pitch which is used by the local youth football club, Buntingford Cougars FC. This use would either need

to be retained on the site, or provided elsewhere in the town, and given the need to provide additional recreation facilities to meet the needs of an increasing population, the dual community use of the school's playing pitch facilities will be required.

- 6.2.8 The site will remain outside the settlement boundary of the town, as defined on the Policies Map, and development of the site for anything other than education use and recreation facilities will not be permitted.

Figure 6.2 Site Location: Land west of London Road



**Policy BUNT2 First School Site Allocation**

- I. Land to the west of London Road, as shown on the Policies Map, is allocated for the development of a 2 form of entry First School.
- II. Development of the site is expected to be in accordance with Policy CFLR10 Education and address the following provisions and issues:

- (a) suitable access arrangements and appropriate local highways mitigation measures;
- (b) sustainable transport measures including the encouragement of walking and cycling;
- (c) the extension of the existing footpath running along the western side of London Road;
- (d) the retention of a playing pitch on the site for dual community use;
- (e) quality local green infrastructure through the site including opportunities for preserving and enhancing on-site assets; and
- (f) other policy provisions of the District Plan and relevant matters, as appropriate.

### **6.3 Employment in Buntingford**

6.3.1 The relative isolation of Buntingford makes it an attractive place for new small scale employment allocations in order to provide opportunities for local businesses to serve the town and nearby settlements in the rural area. The town centre will be strengthened by an increase in expenditure generated by the growing population of the town.

6.3.2 The employment strategy for the town is to protect and enhance the existing employment areas in the town through the development of increased employment floorspace within the existing designated areas. 2 hectares of employment land has been retained through the redevelopment of the former Sainsbury's Depot site. In addition, 3 hectares of additional employment land has been allocated to the north of Buntingford Business Park.

6.3.3 In respect of the Watermill Industrial Estate, the access to the site along Aspenden Road is narrow in width and it is considered that the approval of planning permissions for significant traffic generating developments would exacerbate any current shortcomings in road access to this part of the town. Therefore, development proposals in this location will be limited to B1, B2 and

small-scale B8 uses, where they are assessed as not having an adverse impact on the operation of the highway network.

### **Policy BUNT3 Employment in Buntingford**

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

(a) Park Farm;

(b) Buntingford Business Park;

(c) Watermill Industrial Estate (reserved for B1, B2 and small-scale B8 uses);

(d) London Road Employment Area (reserved for B1(a), B1(c) and/or D1 uses).

II. In addition, 3 hectares of land located to the north of Buntingford Business Park has been allocated as an extension to the existing Employment Area.

## **6.4 Retail in Buntingford**

6.4.1 Buntingford has a small town centre, consisting of small units in a linear High Street, with two small supermarkets. Despite its size, the town centre provides a vital role for the residents of the town and for the rural hinterland. Recognising its size and its relatively limited retail offer, the High 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 viability and vitality of Buntingford's town centre. As such, retail development in Buntingford will be considered in accordance with Policy RTC1 (Retail Development) and RTC4 (Secondary Shopping Frontages).

## **6.5 Leisure and Community Facilities in Buntingford**

6.5.1 Whilst Buntingford is located within a rural setting, public access to the countryside resource that surrounds the settlement could be improved. It is also important that improvements are made to



existing open spaces for sport and recreation and play spaces for children and that new open spaces are provided to support existing and new communities in the town. The Bury Football Club will be retained on its existing site and improvements will be sought to the existing facilities, as appropriate. The Town Council are progressing plans to seek permission to develop a site on the edge of the town for a new cemetery and the provision of new burial spaces in the town will be supported. All development proposals will be considered in accordance with Policy CFLR1 (Open Space, Sport and Recreation).

6.5.2 New development in Buntingford will increase demand for local services and community facilities including healthcare and education. It is important that developments in Buntingford enhance existing and provide new community facilities in order to ensure existing and new communities can access vital services within Buntingford 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).

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## EAST HERTS COUNCIL

### DISTRICT PLANNING EXECUTIVE PANEL – 8 SEPTEMBER 2016

#### REPORT BY LEADER OF THE COUNCIL

#### EAST HERTS DRAFT DISTRICT PLAN – HERTFORD – SETTLEMENT APPRAISAL AND NEW DRAFT CHAPTER 7

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WARD(S) AFFECTED: ALL

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

The purpose of this report is:

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

<b><u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:</b>	
<b>(A)</b>	<b>the Hertford Settlement Appraisal as detailed at Essential Reference Paper 'B' to this report, be agreed; and</b>
<b>(B)</b>	<b>the draft revised Chapter 7 (Hertford), 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.</b>

#### 1.0 Background

1.1 The Council published its Draft District Plan Preferred Options for consultation for a period of twelve weeks between 27<sup>th</sup> February and 22<sup>nd</sup> May 2014.

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

- 1.3 This report presents a Settlement Appraisal for Hertford. The Hertford 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 Hertford 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 Hertford that included four proposed allocations:

- Mead Lane (300 dwellings);
- West of Hertford to the north and south of Welwyn Road (550 dwellings);
- North of Hertford to the west of B158 Wadesmill Road (150 dwellings);
- and South of Hertford west of Mangrove Road (50 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 that, while other site allocations should remain at the levels proposed in the Preferred Options Consultation, due to permission granted in the interim and development currently under construction, a reduced quantum of development should apply to Mead Lane. The following allocations are therefore proposed:

- Mead Lane (200 dwellings);
- West of Hertford to the north and south of Welwyn Road (550 dwellings);
- North of Hertford to the west of B158 Wadesmill Road (150 dwellings);
- and South of Hertford west of Mangrove Road (50 dwellings).

- 2.3 In respect of Employment, the Preferred Options District Plan proposed the allocation of two new Employment Areas, which sought to recognise existing uses, at the Taylor Trading Estate and in the Pegs Lane, Hale Road, Gascoyne Way area.

- 2.4 In respect of the Taylor Trading Estate, the Hertford and Ware Employment Study's conclusions were not such as to provide confidence that its designation would be sustainable in the longer term for solely employment use, and, therefore, it is proposed that this site should not continue to Regulation 19 consultation as a designated Employment Area. However, whilst not benefitting from a discrete Employment Area designation, other policies of the Plan (in particular EDE1) would continue to protect existing employment uses on the site, as appropriate.
- 2.4 Regarding the second proposed designation for the Pegs Lane/Hale Road/Gascoyne Way area, it is now proposed to exclude Sovereign House (permission granted for residential development), the Gates Garage (sui generis use with current application for residential development), and Hertford Police Station (which would then be isolated from the remaining area). The remaining area, to be renamed Pegs Lane, would comprise the East Herts and Hertfordshire County Council offices and would be reserved primarily for B1 use.
- 2.5 The policies contained in the draft revised chapter set out what the proposed development in Hertford 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 <sup>th</sup> February and 22 <sup>nd</sup> 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

### Hertford

#### 1. History

- 1.1 The Preferred Options District Plan proposed development of at least 1,201 new homes in Hertford, plus an element of windfall. 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 four sites for allocation: Mead Lane (300 dwellings); West of Hertford to the north and south of Welwyn Road (550 dwellings); North of Hertford to the west of B158 Wadesmill Road (150 dwellings); and South of Hertford west of Mangrove Road (50 dwellings). In addition, an element of windfall development was attributed to Hertford.

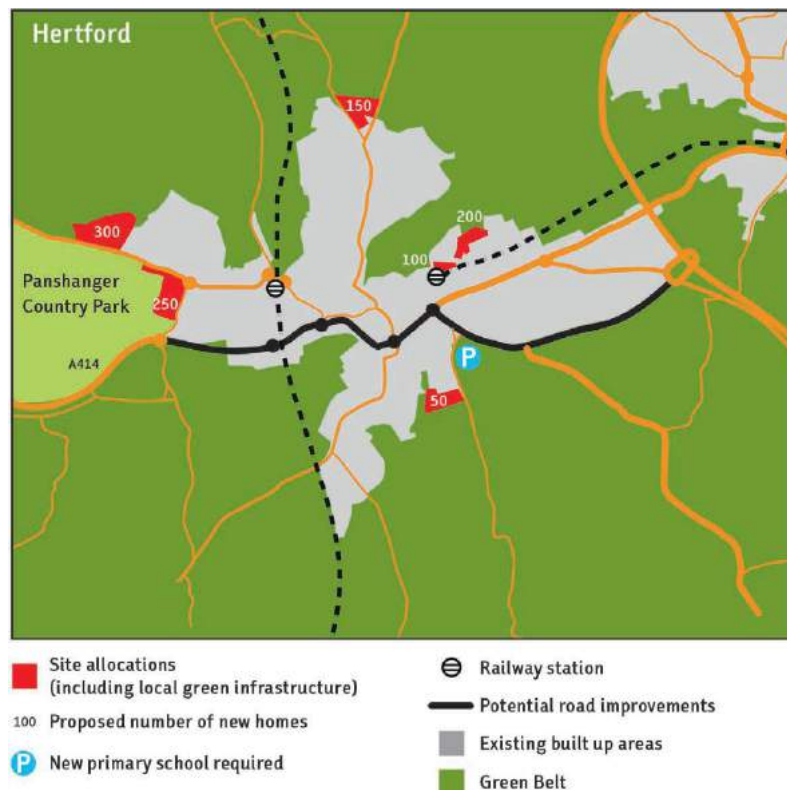


Figure 1: East Herts District Plan, Preferred Options, Hertford Key Diagram

- 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 Hertford and provides conclusions to issues considered at previous stages.
- 1.4 This document 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 town-wide issues which were frequently raised through comments received included:

- Hertford receiving too much growth;
- development on Green Belt land considered to be inappropriate;
- highway infrastructure being unable to cope with the level of development proposed;
- insufficient school places; 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.

2.3 A full summary of the issues that were raised in respect of Hertford 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?CIId=151&MIId=2951&Ver=4>

## **3. Technical Assessments**

### **Green Belt Review**

3.1 The 2015 Green Belt Review assessed 14 parcels within and around Hertford. Only parcel 31a to the West of Hertford (the Sele School area) was adjudged to have the least contribution to Green Belt purposes and as such was considered to have 'high' suitability for development. Parcel 24, to the South East of Hertford, was considered to have 'moderate' suitability for consideration as an area of search for development.

3.2 All other parcels considered in the Green Belt assessment were considered to have a high contribution to the Green Belt purposes and therefore mostly

'very low' (10 parcels) or, in two cases (23 and 31), 'low', overall suitability as areas of search for development.

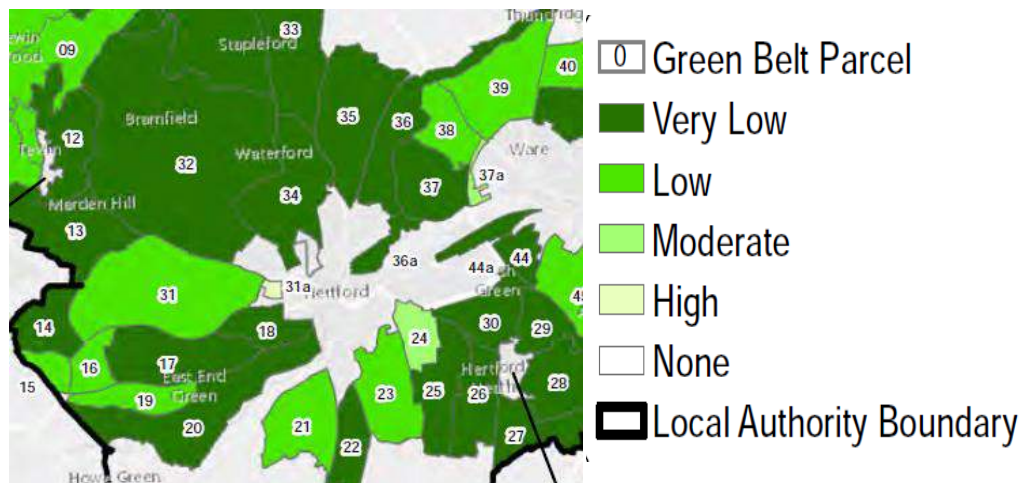


Figure 2: Conclusions of Green Belt Review 2015 for Hertford

3.3 While the above map illustrates the overall findings for the whole settlement, the findings of the Study in relation to specific proposed site allocation areas are covered in greater detail in the relevant sections below.

### Hertford Town Centre Urban Design Strategy

3.4 In February 2015, Tibbalds, a leading planning and urban design consultancy, was appointed by East Herts Council, working together with Hertfordshire County Council and Hertford Town Council, to develop a Vision and Urban Design Strategy for Hertford town centre. This provided a unique, once in a generation, opportunity for consultants and all three councils serving Hertford to work together to provide a multi-faceted Strategy to influence the development and enhancement of its central core for short, medium and long-term time horizons.

3.5 Key elements of the study considered the future of major sites, the design and management of the street scene and transport issues for the town centre. Tibbalds' expertise was further supplemented by property, retail, transport, and landscape architectural specialists over the course of the project. The project was subject to two rounds of public consultation.

3.6 The purpose of the final strategy is to guide future development in Hertford's town centre. It provides a long-term coherent vision for the area, provides design approaches for key areas within the town centre, and aims to guide developers and provide a framework for determining planning applications. The Strategy further seeks to engender a sense of community and to provide opportunities that will reinforce or improve the sense of place associated with Hertford Town Centre and its environs (in line with the sustainability

principles outlined in section 2 of the NPPF (ensuring the vitality of town centres)).

- 3.7 Amongst the Strategy's important movement, design and economic proposals, all of which are intended to raise the profile of the town in retail and economic terms while improving the public realm, the Study includes a Key Sites Strategy for three important sites (Bircherley Green, Maidenhead Street and The Marquee).
- 3.8 It is East Herts Council's aspiration that the Strategy be adopted as Supplementary Planning Guidance in due course. The Strategy can be viewed at: <http://www.eastherts.gov.uk/HertfordTCUDS>.

### **Hertford and Ware Employment Study**

- 3.9 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, March 2016, which can be viewed via the following link: <http://democracy.eastherts.gov.uk/ielssueDetails.aspx?Ild=17408&Opt=3>.
- 3.10 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 employment 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.
- 3.11 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.

- 3.12 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 Hertford, the best existing employment site which also has capacity to accommodate further development or offer possibility for employment uses is identified as being Mead Lane. 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.

### **Transport/Modelling**

- 3.13 Prior to the publication of the Preferred Options District Plan, Traffic modelling work (Paramics) was undertaken as part of the 2010 Hertford and Ware Urban Transport Plan. This identified several constraints in the town's highway network, notably, along the route of the A414; throughout the town centre; Bengoe (rat-running); and the Mead Lane area.
- 3.14 Further to the information received from HCC prior to the Preferred Options consultation, which is detailed throughout the Supporting Document Chapters 4 to 6 above, HCC's submitted response to the consultation confirmed that there were town-wide impact/issues in relation to the effects of proposed development. These matters concerned the cumulative increase in trips on the A414 Gascoyne Way corridor. The A414 was stated to be running very close to capacity during peak periods in Hertford. Study work undertaken up to that date indicated limited potential to increase capacity along the corridor from a combination of junction improvements between the A10 and Hale Road. Furthermore, it was stated that the A414 is currently designated as an Air Quality Management Area (AQMA) due to transport emissions.
- 3.15 It was suggested at that time that capacity enhancements at roundabouts should be investigated to identify whether they provide sufficient capacity for the scale of growth under consideration in the Plan and whether there may be any alternative mitigation schemes which could be further considered. At that point, HCC had commissioned the initial stages of a wider study.
- 3.16 Since the 2014 Preferred Options consultation, a study of the A414 referred to in the representation has been undertaken by AECOM on behalf of Hertfordshire County Council (HCC). The A414 Transport Strategy, Strategic Study – Feasibility Review – Stage 3, particularly examined the A414 corridor through Hertford, between the junction of Hertingfordbury Road/Thieves Lane in the west and the A414/A10 in the east and has

identified constraints to the free flow of traffic. The document was reported to District Planning Executive Panel on 22nd October 2015 and is available to view via the following link:

<http://democracy.eastherts.gov.uk/ieListDocuments.aspx?CId=151&MId=2808&Ver=4>.

- 3.17 The accompanying Panel report discussed not only the finding of the Study, but also the transportation issues related to the A414, Hertford, which were subsequently identified by HCC, as Transport Authority, and the consequential implications that would arise in respect of progressing the District Plan. A letter from HCC, dated 27 July 2015, which was appended to the report, set out the full position in relation to development proposed through the emerging District Plan. The letter confirmed that:

Whilst the full Plan growth is undeliverable without a strategic intervention at Hertford, the assessment we have undertaken indicates that the traffic growth associated with the sites in your current first 5 year housing trajectory (up to 2021) is likely to be acceptable in terms of traffic impact on the A414. However, further detailed localised traffic assessments will need to be undertaken, and mitigation measures developed, as part of the planning process.

The letter further confirmed that:

There is currently room for the traffic growth on the A414 corridor associated with committed development in Hertford.

- 3.18 While this presents the overall picture in respect of development in Hertford, other, more detailed, site specific matters were raised and these are discussed further as these locations are individually considered more fully at the relevant sections below.
- 3.19 Separate to the above, and as part of the Hertford Town Centre Urban Design Strategy, April 2016 (detailed at Section 4), access was provided to updated Paramics modelling in the central area (originally developed as part of the Hertford and Ware Urban Transport Plan, 2010). This was particularly of use in identifying the effects of potential proposals for bus provision in the town centre, which included various redistribution scenarios. The outcome of this informed the final design parameters for the potential redevelopment of the Bircherley Green area, with the conclusion that, taking this and other detrimental effects of redistribution into account, a bus station should continue to be retained in that area.
- 3.20 As mentioned above, there is a declared AQMA within the town, which is focused on a section of Gascoyne Way (A414). The Hertford Town Centre Urban Design Strategy also identified that this already has some impact on



the Castle Grounds and, in particular, partially impacts on the children's play area and neighbouring residential uses. It is therefore important that this position is not exacerbated. To this end, additional trips generated as part of new development should be mitigated. In this respect, it should be noted that the Council is currently developing its own Air Quality Planning Guidance document, which will provide guidance for applicants on steps to be taken to help ameliorate the effects of development.

- 3.21 Importantly, at a strategic level, HCC will be seeking to develop specific measures for mitigation of the A414 corridor (including the stretch through Hertford) through its emerging Hertfordshire 2050 Transport Vision. Public consultation on this document is expected shortly.

### **Mead Lane Urban Design Framework**

- 3.22 The Mead Lane Urban Design Framework (MLUDF) was adopted as a Supplementary Planning Document (SPD) to the East Herts Local Plan in December 2014. The Framework was prepared in order to guide the regeneration of the Mead Lane area. Largely focusing on long-vacant derelict areas, it aims to facilitate the approach of construction of an amount of residential development in the area, while balancing this with bringing forward increased employment provision and introducing improved sustainable transport initiatives.
- 3.23 The conclusions of the Framework, which can be viewed at: <http://www.eastherts.gov.uk/hertfordmeadlane>, were informed by public consultation and by other evidence strands, particularly previous work undertaken in connection with Paramics transport modelling, which underpins the recommendations of the Hertford and Ware Urban Transport Plan, 2010 (UTP), in respect of the Mead Lane area. The UTP is available on HCC's website: <http://www.hertfordshire.gov.uk/services/transtreets/tranpan/tcatp/handwutp.pdf/>.
- 3.24 Further discussion of the MLUDF occurs in relation to the specific proposed Mead Lane site allocation area below.

### **Heritage Impact Assessment for Panshanger Park and its Environs**

- 3.25 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. Following the publication of each authority's Local Plan consultation in 2014 and 2015, representations made by Historic England to each consultation advised that further evidence should be gathered to take into account the significance of

heritage assets in the vicinity of potential site allocations presented in each Plan.

- 3.26 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.
- 3.27 While the majority of the study focuses on areas closest to the proposed development at Birchall Garden Suburb, the report also makes certain observations in respect of areas of land that could be impacted by proposed development to the West of Hertford. Discussion of the findings of the Study in relation to the specific proposed site allocation area is covered in greater detail in the relevant section below. The full Study, which was published in July 2016, can be viewed via the following link: <http://www.eastherts.gov.uk/panshangerhia>.

### **Delivery Study**

- 3.28 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 proposed sites in Hertford, as none of these were individually large enough to be included within strategic thresholds, it did test the financial viability of different site typologies. The study concluded that development schemes in the Hertford 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. Mead Lane may be subject to slight differences in approach, and this is discussed further below.

## **4 Duty to Co-operate**

- 4.1 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.
- 4.2 In relation to Hertford, matters which formed particular areas for discussion with Welwyn Hatfield Borough Council, included: the general effects of congestion on the A414 and potential effects of trip generation on the A1; and, the need to take into account Panshanger Park for any development proposals to the West of Hertford.



## 5 Neighbourhood Planning

- 5.1 While no Neighbourhood Plans have yet come forward for Hertford for formal consideration, a Plan is in the early preparation stages to cover the Sele Ward, and its Area Designation was agreed 5<sup>th</sup> April 2016. It is also understood that consideration may be being given to bringing forward a Neighbourhood Plan for the Bengoe area.

## 6 Emerging Strategy

- 6.1 Following the Preferred Options consultation, and as detailed above, a significant amount of technical work has been undertaken on the District Plan to ensure deliverability of its proposed site allocations. Discussion of this and other evidence which has been presented, leads to the following Officer conclusions for the discrete policy areas. In light of the evidence available, it is considered that four sites should be allocated in Hertford:

- Mead Lane Area – 200 dwellings
- West of Hertford – 550 dwellings
- North of Hertford – 150 dwellings
- South of Hertford – 50 dwellings

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

### Policy HERT2: Mead Lane Area

#### Introduction

- 6.3 As noted, at paragraph 1.1 above, this brownfield site, within the existing urban area of Hertford, was included in the District Plan Preferred Options Consultation for the proposed delivery of 300 homes.
- 6.4 The area would, in effect, be carried forward from earlier proposals contained in the adopted East Herts Local Plan, April 2007, where Policy HE5 'Mead Lane Area West of Marshgate Drive' applies and where paragraph 12.3.12 provides the potential for land to the East of Marshgate Drive to be considered for future development, subject to certain caveats.
- 6.5 Subsequent to the Preferred Options Consultation, the Mead Lane Urban Design Framework was published in December 2014, which sets the parameters for development of the area.

- 6.6 In respect of the two areas identified for development within the Preferred Options consultation draft overall Policy HERT2 area, the Council has since granted permission (3/14/0590/FP) for the redevelopment of the site immediately to the north of Hertford East station. This includes provision of 120 residential units; 100 sqm of retail floorspace; provision of a link road between Mill Road and Mead Lane; and a passenger interchange. The development is currently under construction, with a substantial amount already built, and is likely to be completed by the end of 2016.
- 6.7 The implication of this site delivery is that a commensurate reduction in the amount of development to be delivered through the policy provisions of HERT2 of the Draft District Plan will need to be made in its Regulation 19 iteration.
- 6.8 It should be noted that the policy area is in two separate ownerships; the majority being owned by National Grid, with a smaller section to the east of Marshgate Drive by the owners of the Norbury Fencing business.

#### **Consultation Responses – Policy HERT2: Mead Lane Area**

- 6.9 A number of comments were received in respect of draft Policy HERT2 at the 2014 Preferred Options Consultation stage.
- 6.10 The main issues raised related to (in no particular order):
- Concern over lack of infrastructure provided in connection with recent development in the area and apprehension over the ability of roads to cope with more development;
  - Traffic congestion concerns;
  - Support for development in line with the Mead Lane Urban Design Framework;
  - Houses required in the area, not just flats;
  - Flood zone and drainage considerations;
  - Objection to using employment land for housing;
  - Need to mitigate impacts on River Lea and King's Mead's;
  - Hertford and Ware Urban Transport Plan measures need to be included in proposals;
  - Alternative site/s in the Employment Area proposed for development.

#### **Technical Assessments – Policy HERT2: Mead Lane Area**

- 6.11 As detailed above, at paragraph 3.23 onwards, the Mead Lane area is subject to provisions of the Mead Lane Urban Design Framework, Supplementary Planning Document, December 2014, which itself is

predicated on the conclusions of the Hertford and Ware Urban Transport Plan, 2010.

- 6.12 The site promoters have advised that other technical work has been undertaken by themselves in the past, particularly in respect of: site drainage and flooding constraints; land contamination; ecological matters; transport; local air quality; and noise. However, these elements will require refreshing, as appropriate, to provide the latest position to support development proposal submissions.

### **Identification of Site Constraints – Policy HERT2: Mead Lane Area**

- 6.13 As this brownfield site is located within the urban area of Hertford, with existing Local Plan policy HE5 and adopted SPD provisions, the Mead Lane Urban Design Framework, there are not considered to be any significant policy constraints that would prevent the development of the site.
- 6.14 However, there are a number of particular site-specific issues which will require addressing through the development process.
- 6.15 Firstly, the site is subject to significant land contamination resultant from previous uses and, while a certain amount of work has taken place over past years, further remediation of the area will need to occur prior to development.
- 6.16 Secondly, of the area covered by the redundant gas works, around a third of this area is located in Flood Zones 2 or 3 and this will need to be taken into consideration in planning development in this location.
- 6.17 There is also the potential for small pockets of historic landfill to exist in the locality, which may also impact on development proposals.

### **Stakeholder Engagement**

- 6.18 A HERT2 Mead Lane Area Partnership Group Meeting was held on 24th July 2014. In addition to East Herts Council Officers, site promoters and agents of the larger site, the following stakeholders were represented:

Thames Water  
Herts County Council: Highways;  
Education; and  
Property.

- 6.19 The main purpose of the meeting was to discuss outstanding issues regarding site HERT2, which would encompass both site specific matters

and, where appropriate, wider strategic issues. The following matters were particularly relevant:

### **Working with Other Site Promoters**

- 6.20 The need to work together with the minority land owner was discussed and it was agreed that discussions would continue to seek to achieve agreement to progress comprehensive redevelopment of the site.

### **Education**

- 6.21 While it was unlikely that it would be considered necessary to provide a new school on the Mead Lane site, S106 contributions would be sought for both primary and secondary education as well as other services listed in the HCC toolkit.

### **Transport**

- 6.22 The primary constraint in terms of vehicular access is the single point of access into Mead Lane from Mill Road. There is also a junction capacity issue at both the junction of Mill Road/Ware Road and the Bluecoats roundabout on the A414. The issue of emergency access would need to be considered.
- 6.23 Consideration was also needed in respect of car parking provision and the potential impact on the wider area. At the time of the meeting, it was detailed that adjacent developments had made financial contributions towards the creation of a car club and this initiative should be continued. Improvements to the street scape in the area would also be required.
- 6.24 The contents of the Hertford and Ware Urban Transport Plan (2010) should inform transport solutions.
- 6.25 Uses should be as set out in the Preferred Options consultation to reflect that existing employment space needs to be maintained and not be jeopardised by the proximity of new residential development. This should be supplemented by new increased employment provision, which would also form a suitable buffer to avoid conflict between new residential and existing employment uses, some of which are non-neighbourly in nature.
- 6.26 Hertfordshire Highways were content with the level of residential development proposed, provided it remains within the levels detailed in the UTP, but in order for development to proceed, Marshgate Drive and Mead Lane would need to be better connected. Proposals should allow for bus access via a loop through the site.

## **Waste Water**

- 6.27 Thames Water stated that the aim should be for development in this location to lead to a reduced flow of surface water into the foul sewer network. The site would drain to Rye Meads Sewage Treatment Works (STW) which currently serves a population catchment of over 400,000 people in the wider area.
- 6.28 A Water Cycle Study undertaken in 2008/9 forecast growth and the consequential impact on Rye Meads STW; however, the growth was not realised due to the downturn in housing development. The predicted capacity limitation dates within the study will effectively move forward; however, ongoing works to change the way the sewage is treated have provided 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.
- 6.29 In terms of site specifics, there was not anticipated to be any problems associated with foul drainage as the trunk sewer is located close to the site and there were local connections leading to it. Thames Water would reserve the right to request an impact study to confirm if any suggested point of connection would be suitable.
- 6.30 In terms of Surface Water issues, SUDs are generally favoured. Contamination on the site could have an impact in respect of discharging to the river, but the process of development may actually result in an improvement on existing conditions. A foul water sewer drainage solution should be viewed as a last option.

## **Wildlife Sites**

- 6.31 While unable to attend the meeting, the Herts and Middlesex Wildlife Trust communicated that while the Trust was at that time undertaking an assessment of existing wildlife sites as well as potential new sites, it was not considered likely that any issues would apply for the HERT2 area.

## **River**

- 6.32 When the first draft of the Mead Lane UDF had been prepared, discussions had been held with British Waterways (now the Canal and River Trust). They wanted to ensure that any new development would not impede the towpath and if possible, that the towpath should be widened and made more

accessible. Contact should be made with the Trust to discuss issues regarding the river frontage and ecology.

### **Site Remediation**

- 6.33 It was reported that remediation schemes had taken place previously but that further work would likely be required for residential use.

### **Flooding**

- 6.34 As part of the site lies within a flood risk area discussions would need to be held with the Environment Agency. For information purposes it was stated that the development of the former TXU site included basement parking as a flood mitigation measure. The Strategic Flood Risk Assessment, which is published on the Council's website, should be referred to in bringing forward development proposals.

### **Developer Meetings and Information – Policy HERT2: Mead Lane Area**

- 6.35 Since the Partnership Group Meeting, one meeting has taken place with Officers of the Council and the site promoters of the largest site parcel in respect of the emerging District Plan. Communication has also been ongoing in respect of emerging information between the two parties.
- 6.36 The need to prepare a Statement of Common Ground for Examination purposes has been agreed; however, while the smaller land parcel owner has confirmed the wish to bring forward that site as part of development proposals for the HERT2 policy area, there remains the need to secure agreement to joint working to ensure comprehensive delivery of the overall site. This will be a matter to be addressed going forward.

### **Land Uses and Proposals – Policy HERT2: Mead Lane Area**

- 6.37 As noted above, due to the grant of permission for a mixed use development north of the station for 107 dwellings which is currently under construction, the level of development proposed for the HERT2 area has been reduced from 300 dwellings to 200 dwellings.
- 6.38 In respect of the 200 dwellings to be delivered along with 3,000sqm employment as part of a mixed-use development, it is the view of Officers that this presents a reasonable level of development when taking into account all of the technical evidence commissioned by the Council (detailed above) which confirms the stance of a mixed-use development being the most appropriate solution for this site.

- 6.39 However, it should be noted that the main site promoter currently favours a wholly residential development for the HERT2 area. Setting this issue to one side, the site promoter has confirmed that the Council's proposed delivery schedule involving 100 dwellings being delivered in the first five years of the plan (by 2022), with the remaining 100 dwellings to be delivered between 2022 and 2027, would be the correct approach.

### **Deliverability Assessment – Policy HERT2: Mead Lane Area**

- 6.40 As stated above, at paragraph 3.28, the Council's Delivery Study concluded that, while development schemes in the Hertford 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, Mead Lane may be subject to slight differences in approach.
- 6.41 The 'Plan Viability, Affordable Housing and CIL Study, 2015', which was produced in conjunction with the main Delivery Study, identifies that for the Mead Lane [*and Bishop's Stortford Good's Yard*] sites there are likely to be higher site specific costs related to transportation works, in particular, and also that site remediation costs would also be associated with these sites. By their nature, these costs are 'abnormal', but exact amounts were unknown at that time.
- 6.42 Therefore, due to the nature of these two sites, although the Study considers that they are viable at policy level for affordable housing, it is likely that once detailed masterplans and evidence is prepared, the viability assumptions should be refined.
- 6.43 Figure 3, below, is the Overall Strategy Diagram from the Mead Lane Urban Design Framework, December 2014. This shows the proposed distribution of uses for the Mead Lane Area, which would be expected to be delivered via Policy HERT2.

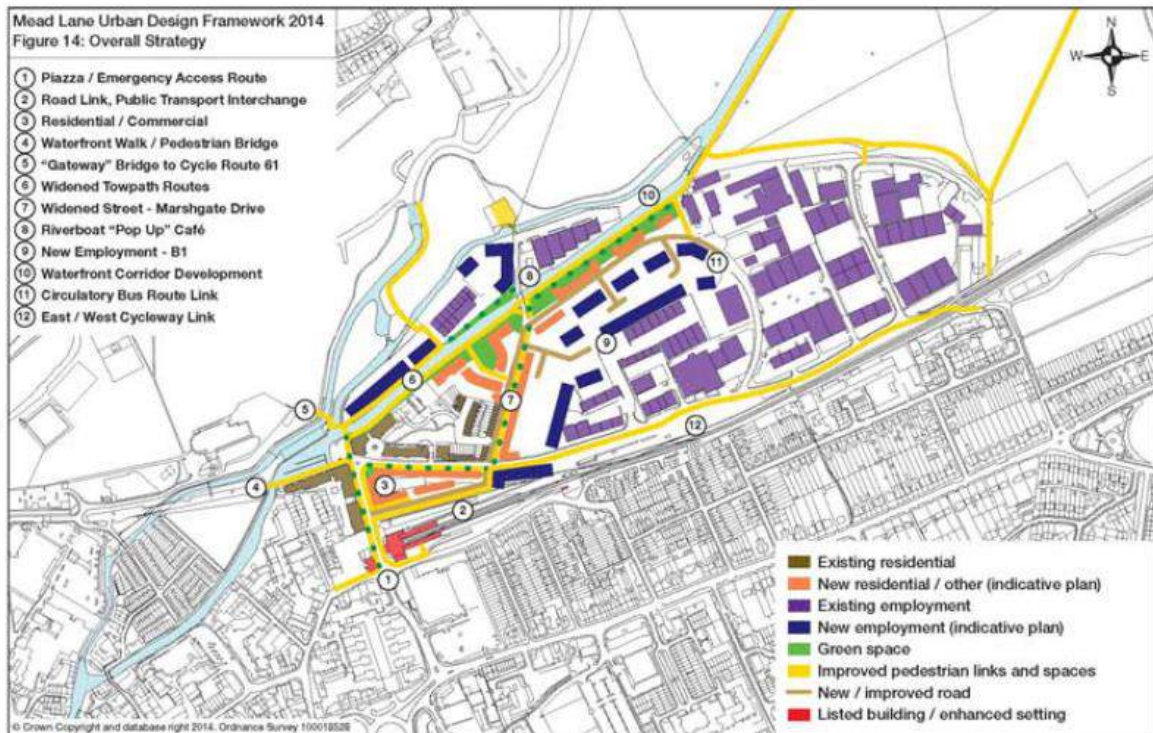


Figure 3: Mead Lane Urban Design Framework, December 2014, Overall Strategy Diagram

### Infrastructure Needs – Policy HERT2: Mead Lane Area

6.44 Given the status of the Mead Lane Urban Design Framework, the infrastructure requirements for this site have largely been established. However, the passage of time since the adoption of the document means that it is important that the infrastructure needs should be stated. The main requirements are therefore identified below:

- Affordable Housing;
- 3,000sqm B1 employment floorspace;
- quality local green infrastructure throughout the site which links into and improves existing assets, especially along the river corridor;
- new utilities, including, inter alia: integrated communications infrastructure to facilitate home working;
- sustainable drainage and provision for flood mitigation;
- local highways mitigation measures (with contributions towards wider, strategic, measures) including a link between Marshgate Drive and the existing eastern spur road to the east of the site to complete the circulatory route to allow extension of bus routes into the area;
- the widening of Marshgate Drive to allow for improved vehicular and pedestrian access and car parking/car share scheme;
- sustainable transport measures, both through improvements to the existing walking and cycling networks in the locality including a 3m



pedestrian/cycleway to the south side of Mead Lane and improvements to the towpath and links with the adjoining area and the town;

- remediation of land contamination;
- public open space/s within the site, including the provision of a play area and opportunities for public art interventions and space for wildlife;
- necessary on-site and appropriate off-site infrastructure;
- other financial contributions, as appropriate.

### **Implementation – Policy HERT2: Mead Lane Area**

- 6.45 The majority of the site lies in the ownership of a single landowner with a developer partner in place. The other, minority, parcel of land is in single land ownership. Both owners have indicated willingness to bring the site forward through the District Plan and it is anticipated that solutions will be found to enable the development of the site to be achieved within the timescales envisaged.
- 6.46 While it is noted above that the main site promoter currently favours a wholly residential development for the HERT2 area, it is the Officer view that the mixed-use approach will provide the most beneficial solution for the town as a whole. Furthermore, the site promoter has confirmed that the Council's proposed delivery schedule involving 100 dwellings being delivered in the first five years of the plan (by 2022), with the remaining 100 dwellings to be delivered between 2022 and 2027, would be achievable.

### **Policy HERT3: West of Hertford**

#### **Introduction**

- 6.47 At the Preferred Options Stage, Land to the West of Hertford was proposed for the delivery of 550 new homes, to be split across two sites to the north and south of Welwyn Road adjacent to the Sele Farm part of the existing built up area of Hertford.
- 6.48 Taking into account available evidence, it is considered that the site should continue to be identified as an allocation within the Regulation 19 version of the Plan. The site is discussed in further detail below.

#### **Consultation Responses – Policy HERT3: West of Hertford**

- 6.49 A significant amount of comments were received in respect of draft Policy HERT3 at the 2014 Preferred Options Consultation stage.

The main issues raised related to (in no particular order):

- Panshanger Park – potential impact of development on this area and the need to protect important views, wildlife, and heritage aspects;
- some support for the redevelopment of the site to the north of Welwyn Road to address neglected area which is used for unauthorised motor activities and illegal waste tipping;
- concern over the ability of the road network to accommodate development;
- Wildlife concerns and the need to protect both designated and other wildlife sites in the area;
- Objection to loss of Green Belt/coalescence with Welwyn Garden City;
- Drainage, waste water and flooding issues;
- Traffic congestion concerns;
- Need for sustainable transport as part of development;
- Lack of education capacity in the area;
- Development should be directed elsewhere;
- Loss of views;
- Mineral extraction opportunities to be factored into development proposals.

### **Technical Assessments – Policy HERT3: West of Hertford**

6.50 The following sections summarise the various technical evidence based assessments that have been undertaken since the Preferred Options consultation to assess site HERT3 alongside the wider Plan preparation process.

#### East Herts Green Belt Review, 2015 – Policy HERT3: West of Hertford

6.51 As stated above at paragraph 3.1, the 2015 Green Belt Review assessed 14 parcels within and around Hertford. In respect of draft policy HERT3, West of Hertford, two parcels of land fall within this overall area (parcels 31 and 32).

6.52 Of these, parcel 31 was considered to have ‘low suitability’, and parcel 32 was considered to have ‘very low suitability’ as Areas of Search for development. The full assessment of each area can be found at pages 53 to 58 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.

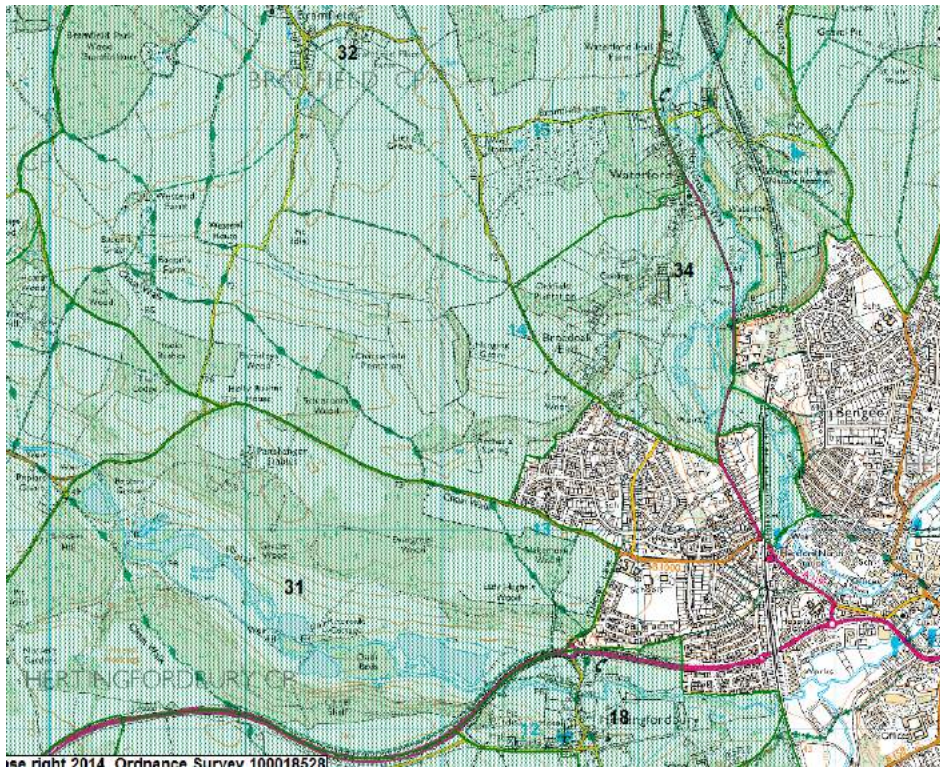


Figure 4: East Herts Green Belt Review Parcels identified by PBA for land to the West of Hertford.

- 6.53 Parcel 31 covers the area to the west of Hertford from Thieves Lane in the east to Henry Wood in the west, and B1000 Welwyn Road to the north and the A414 to the south. The Study considered that the parcel was of 'Major importance in checking the unrestricted sprawl of large built-up areas'; was of 'Major importance in preventing neighbouring towns merging'; was of 'Major importance in safeguarding the countryside from encroachment'; and made 'Slight/Negligible 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.
- 6.54 Parcel 32 covers the area to the west of Hertford from the edge of the built up Sele Farm area in the east to far side of Bramfield Park Wood in the west, and Bramfield Woods and Row Wood to the north and B1000 Welwyn Road to the south. The Study considered that the parcel was of 'Slight/Negligible / Major (in the south eastern part) importance in checking the unrestricted sprawl of large built-up areas'; was of 'Slight/Negligible importance in preventing neighbouring towns merging'; was of 'Paramount (Moderate in area just north of Welwyn Road) 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.

## Heritage Impact Assessment – Policy HERT3: West of Hertford

- 6.55 As detailed above, at paragraph 3.26, a ‘Heritage Impact Assessment for Panshanger Park and its Environs’ (HIA) has been produced on behalf of both East Herts and Welwyn Hatfield Councils to consider the potential impact of development to the East of Welwyn Garden City and to the West of Hertford.
- 6.56 Chapter 4 of the Study assesses potential site allocations, with the West of Hertford considered at section 4.4. Taking into account the characteristics of Panshanger itself and the surrounding landscape, the overall findings of the report are that “the potential development of parts of this rural area, especially in close proximity to the eastern boundaries of the Park which the outer suburbs of Hertford already partially meet, has the potential to cause harm to the heritage significance of the Registered Park and Garden”.
- 6.57 The most important sections are quoted in full below:
- 4.4.5 Development on this eastern site would therefore be very self-contained and discrete from the Registered area, but would be directly adjacent to the boundary of the parkland. This would erode the already small rural buffer that still exists at this eastern end of Panshanger, further enclosing the parkland with urban development. If development is to occur in this location, careful consideration must be given to how the development will be designed to ensure as much of the rural character of this small area can be retained. It would be desirable to maintain an open area along the south side, perhaps using the existing permissive footpath route as the edge against which a screening boundary could be planted to mitigate the visual impact of development in this location. This would perform a similar function to the existing densely treed boundaries of the park which mitigates the existing visual impact of the western suburbs of Hertford.
  - 4.4.6 Development on the northern site has the potential to also effectively further enclose Panshanger with urban development. However, the existing western edge of the Sele Farm suburb is rather untidy, if not unduly prominent, and some development in this location may actually be beneficial as it could form a more appropriate urban edge which would be an enhancement to the landscape in this area. It would similarly however be beneficial to leave the western end of this development site more open in

order to leave a buffer zone between the new development and the Registered area of Panshanger.

4.4.7 In both the HERT3 sites, the scale of development should be kept modest to reflect the urban fringe location of the sites and to mitigate the potential impact on Panshanger Park, and more indirectly Goldings.

6.58 Following Chapter 4's description of the potential effects that development in the two separate HERT3 locations could have in heritage terms, Chapter 5 goes on to describe the ways in which development could potentially be mitigated. It contains site specific development proposal criteria against which development proposals on sites should be assessed at the masterplanning stage.

### **Identification of Site Constraints – Policy HERT3: West of Hertford**

#### Green Belt – Policy HERT3: West of Hertford

6.59 This site is currently located within the Green Belt, with the inner Green Belt boundary which is drawn tight against the built-up edge of Hertford. 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.

#### Green Belt Conclusion

6.60 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, there is 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 three land areas to the West of Hertford 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 the 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.

6.61 Therefore, on balance, it is considered that, in order to allow for an urban extension to the sustainable settlement of Hertford (which is the second 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 – Policy HERT3: West of Hertford

6.62 As detailed earlier in this Settlement Appraisal, HCC Highways have reviewed their position in relation to development in Hertford as more up to date evidence, particularly in respect of impact on the A414, has become available.

6.63 It is now the case that there is no in-principle objection to development of up to 550 dwellings in this location at a strategic scale. However, detailed matters pertaining to access and the potential need to contribute to wider strategic improvements to mitigate impact of development remain to be addressed through the planning application process. It is not considered at this stage that any matters would prove to be of particular concern.

#### Foul Water Drainage – Policy HERT3: West of Hertford

6.64 Development to the west of Hertford would require upgrades to the sewerage system and are considered to be deliverable through the development of the sites.

#### Surface Water Flooding – Policy HERT3: West of Hertford

6.65 Where there is evidence of surface water flooding issues that would need to be addressed mitigation will be required. This would be achieved through successful planning of the sub-site areas. There would be the potential to integrate sustainable urban drainage (SuDS) features into the landscape via incorporation into multi-functional green spaces in place of standard engineered solutions.

#### Minerals – Policy HERT3: West of Hertford

6.66 Due to its location within the Sand and Gravel belt, 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. There would therefore be a requirement for further investigative work through the planning process.



### Heritage Assets – Policy HERT3: West of Hertford

- 6.67 There are no listed buildings lying directly within the overall site area, and none within the immediate locality of the site area. The Grade II Panshanger Registered Park and Garden immediately about the southern sub-site area. The potential impact of development on this area is covered within the HIA.

### Heritage Impact – Policy HERT3: West of Hertford

- 6.68 While the HIA, which is discussed more fully above, is an important document which will be a valuable resource in shaping emerging development proposals for the area, it must be borne in mind that this forms only one strand of the overall evidence base for the area and that design proposals for the development sub-sites will evolve in due course, taking numerous matters into account. Differing constraints apply to the individual sub-site areas, which will require discrete methods of amelioration.
- 6.69 It should be noted that the indicative potential site layouts provided by developers, and reproduced below at figures 5 and 6, were supplied prior to the finalisation of the Study and these should therefore not be viewed as final proposals. Moreover, while the study identifies key issues and potential negative impacts of development in the two separate HERT3 locations, the subsequent site appraisals detail potential mitigation and enhancement measures and design principles to help ameliorate such impacts. Such criteria include matters such as planting and landscaping, views, orientation of streets and layouts (including traffic management), building heights and detailed design.

### Wildlife – Policy HERT3: West of Hertford

- 6.70 There are two wildlife sites which are located either wholly or partially within the proposed development site area:

#### *58/025 Panshanger Park*

- 6.71 This wildlife site is based around much of the Panshanger Park area, which abuts the site area. Part of the wildlife site extends its coverage across the 'panhandle' area to the north of the sub-site located to the south of Welwyn Road/west of Thieves Lane.
- 6.72 The site is home to numerous habitats of varying types across the overall area, which comprises large ornamental parkland developed around a deeply incised valley of the River Mimram.

59/077 Land West of Sele Farm

- 6.73 This wildlife site comprises species diverse old grassland and scrub bordered by a rough hedge. The grassland is mainly neutral with a central area of more acid species.
- 6.74 Both wildlife sites are of individual character and quality and development proposals will need to demonstrate that mitigation can be achieved to ensure that these are not compromised.

**Stakeholder Engagement – Policy HERT3: West of Hertford**

- 6.75 A joint Land East of Welwyn Garden City Broad Location and West of Hertford Proposed Allocation Partnership Group Meeting was held on 16<sup>th</sup> May 2014. In addition to East Herts Council Officers, site promoters and agents, the following stakeholders were represented:

Thames Water  
NHS England/NHS Hertfordshire  
Herts County Council (HCC): Highways;  
Transport Modelling;  
Education;  
Minerals and Waste; and  
Property.

- 6.76 The main purpose of the meeting was to discuss outstanding issues regarding the two site locations and encompassed both site specific matters and, where appropriate, wider strategic issues. The following matters were particularly relevant to the HERT3 area:

**Education**

- 6.77 At the point of the meeting, which was prior to the finalisation of plans and subsequent opening of the all-through school facility at Simon Balle, in respect of primary provision, HCC identified that the Simon Balle expansion would be required to support the pupil yield of the existing community. Therefore, it was likely that development of 550 homes to the west of Hertford would generate a need for one form of entry (1FE). Expansion of an existing school in the area would therefore be expected to be fully funded by development.
- 6.78 At secondary level, the school planning area consists of both Hertford and Ware so development across the two towns would be considered when calculating future need. Current forecasts at the time of the meeting showed that there was no capacity at secondary level beyond 2017.



## **Community Facilities**

- 6.79 S106 contributions would be sought towards childcare, nurseries, libraries and youth services.

## **Healthcare**

- 6.80 At the time of the 2014 meeting, GP surgeries in Hertford were approaching capacity and NHS England would be seeking contributions to provide additional capacity; either in the form of financial contributions or provision of a new health facility.

## **Minerals and Waste**

- 6.81 In terms of Hertford, at the time of the meeting in 2014 it was stated that the mineral deposits had already been worked out and there would be no further requirement to extract.

*Post Meeting Note:* Subsequent to the meeting, the HCC response to the Preferred Options consultation confirmed that “there may be the opportunity to extract resources for use on site during development”.

## **Highways**

- 6.82 The matter of the A414 being close to capacity was the most important issue raised and the need for a solution to be identified at the strategic level. Local issues were also discussed.

## **Passenger Transport**

- 6.83 The limitations of existing passenger transport infrastructure were raised and discussions revolved around the need for development to provide improvements, either through direct provision or contributions (or a combination of the two).

## **Waste Water**

- 6.84 The site would drain to Rye Meads Sewage Treatment Works (STW) which currently serves a population catchment of over 400,000 people in the wider area.
- 6.85 A Water Cycle Study undertaken in 2008/9 forecast growth and the consequential impact on Rye Meads STW; however, the growth was not realised due to the downturn in housing development. The predicted

capacity limitation dates within the study will effectively move forward; however, ongoing works to change the way the sewage is treated have provided 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.

- 6.86 In terms of site specifics, the sub-sites to the west of Hertford were located on the extremities of the existing network and the capacity was unlikely to be able to support the demand from new development. The best option for the sites to connect to the existing network would be for a new sewer connection to be constructed to the south, towards the River Mimram, to connect to the trunk sewer in this location. Both site promoters would need to work together in terms of a drainage solution so that they would benefit each other and would not dis-benefit each other if the developments were not programmed to come forward at the same time.

### **Wildlife Sites**

- 6.87 It was confirmed that Herts and Middlesex Wildlife Trust (HMWT) had made contact with the site promoters to the west of Hertford to initiate the survey of existing designated wildlife sites and site survey work was underway at the time of the meeting.

### **Developer Meetings and Information**

- 6.88 At the date of writing, no meetings have been held with site promoters since the Partnership Group Meeting. However, communication has been ongoing in respect of exchange of appropriate information between site promoters and the Council.
- 6.89 The need to prepare Statements of Common Ground for Examination purposes has been agreed with both sub-site promoters and these will be prepared in due course.

### **Land uses and Proposals – Policy HERT3: West of Hertford**

- 6.90 The site is proposed for residential development of around 550 dwellings to be split across the two sub-sites – 300 to the north of Welwyn Road and 250 to the south of Welwyn Road/west of Thieves Lane. This reflects the same position as the Preferred Options Consultation.
- 6.91 In addition to residential provision, development will provide supporting infrastructure and appropriate buffers and mitigation measures to ensure successful relationships with the neighbouring uses and assets.



Figure 5: Land to the North of Welwyn Road - Illustrative conceptual masterplan provided by site promoters – not binding on the Council



Figure 6: Land to the south of Welwyn Road/west of Thieves Lane – Illustrative conceptual framework plan provided by site promoters – not binding on the Council

## Infrastructure Needs

6.92 The infrastructure requirements of bringing forward development in this location are identified below:

- Affordable Housing;
- potential mineral extraction requirements;
- new utilities, including, inter alia: integrated communications infrastructure to facilitate home working;
- upgrades to the sewerage system;
- sustainable drainage and provision for flood mitigation;
- local highways mitigation measures (with contributions towards wider, strategic, measures);
- sustainable transport measures, both through improvements to the existing walking and cycling networks in the locality and enhanced passenger transport services;
- public open space/s within the site, including the provision of play areas and opportunities for outdoor health and fitness activities;
- quality local green infrastructure, including enhancement to on and off-site wildlife assets;
- measures to mitigate impact on Panshanger Park;
- contributions towards social infrastructure, including education, health services and other community facilities
- all necessary on-site and appropriate off-site infrastructure.

## Implementation

6.93 The overall site is in split ownership; however, each of the sub-site areas are in single ownership. Both site promoters consider that delivery within the first five years of the plan period (i.e. by 2022) will be achievable.

## Policy HERT4: North of Hertford

### Introduction

6.94 At the Preferred Options Stage, Land to the North of Hertford was proposed for the delivery of 150 new homes, to the west of the B158 Wadesmill Road/north of Sacombe Road, which would be adjacent to the Bengoe neighbourhood of the existing built up area of Hertford.

6.95 Taking into account available evidence, it is considered that the site should continue to be identified as an allocation within the Regulation 19 version of the Plan. The site is discussed in further detail below.

## **Consultation Responses – Policy HERT4: North of Hertford**

6.96 Various comments were received in respect of draft Policy HERT4 at the 2014 Preferred Options Consultation stage.

The main issues raised related to (in no particular order):

- educational capacity – particularly in respect of Bengoe Primary School;
- objection to loss of Green Belt;
- coalescence issues with neighbouring Chapmore End;
- parking impeding flows in Sacombe Road;
- need to safeguard existing landscapes and screen new development to limit impact;
- traffic impact/congestion in locality and town centre;
- negative wildlife impact of development;
- surface water flooding concerns;
- development should be limited to the Bengoe Nursery site;
- objection to development/loss of employment at Bengoe Nursery;
- need to allow potential opportunity to extract mineral deposits for use on site;
- waste water concerns;
- topography of Bengoe being an impediment to cycling and walking;
- need for community facilities;

## **Technical Assessments – Policy HERT4: North of Hertford**

6.97 The following sections summarise the technical evidence based assessment that has been undertaken since the Preferred Options consultation to assess site HERT4 alongside the wider Plan preparation process.

### East Herts Green Belt Review, 2015 – Policy HERT4: North of Hertford

6.98 As stated above at paragraph 3.1, the 2015 Green Belt Review assessed 14 parcels within and around Hertford. In respect of draft policy HERT4, North of Hertford, one parcel of land falls within this overall area (parcel 35).



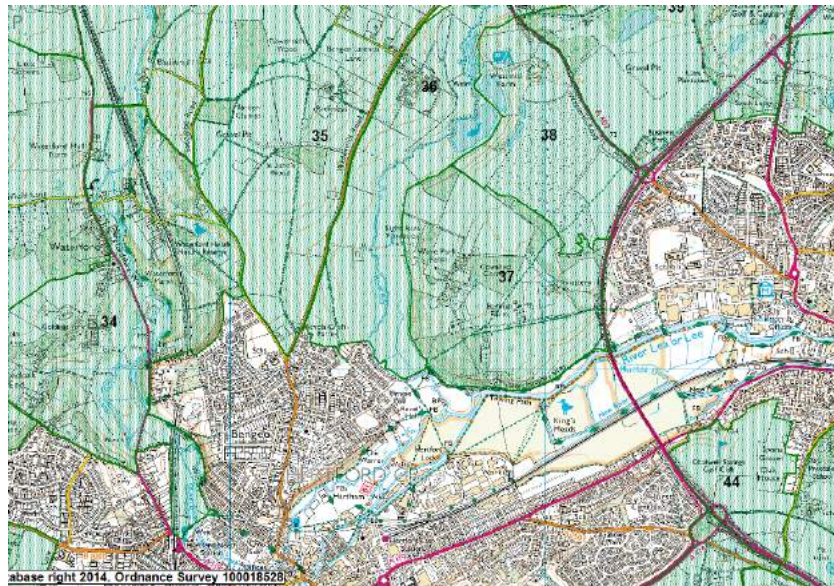


Figure 7: East Herts Green Belt Review Parcels identified by PBA for land to the North of Hertford

- 6.99 Parcel 35 was considered to have ‘very low suitability’ as an Area of Search for development. The full assessment of each area can be found at pages 53 to 58 of the Green Belt Review, which can be viewed via the following link: <http://www.eastherts.gov.uk/greenbeltreview2015>.
- 6.100 As a brief synopsis, the Study considered that the parcel: was of ‘Paramount importance/(Slight/Negligible in southern corner) in checking the unrestricted sprawl of large built-up areas’; was of ‘Slight/Negligible’ importance in preventing neighbouring towns merging’; was of ‘Paramount importance/(Slight Negligible in southern corner) in safeguarding the countryside from encroachment’; and made ‘Slight/Negligible 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.
- 6.101 However, it should be noted that the proposed development area is situated within the southern end of the overall large parcel area, which would be less affected by development than the rest of the parcel. It further identifies that “Only southern end of parcel adjoins built up area where Green Belt boundary follows weak boundary where there are allotments and a nursery”... “Designation has constrained growth of town into this area. Any significant development extending beyond immediate edge of town would be perceived as ‘sprawl’; local opportunity here to strengthen boundary in conjunction with small development of nursery site”. It further points out that “Any development beyond this small area would lead to very prominent encroachment into this widely exposed, generally open and largely elevated area of mainly unspoilt countryside”.

## **Identification of Site Constraints – Policy HERT4: North of Hertford**

### Green Belt – Policy HERT4: North of Hertford

- 6.102 The above section details the findings of the Green Belt Review in respect of this site area. The conclusions of the Study in respect of overall suitability of the land proposed for development as an Area of Search are that the most southern section, which comprises the nursery site would provide an opportunity to strengthen the boundary in this area; however, development beyond that would lead to encroachment.
- 6.103 However, when parcel appraisals took place, the Green Belt Review considered land in its current state. It should be noted that there is a current planning application for the extraction of minerals in the location to the north of the site (which slightly overlaps the HERT4 development area) and which is due to be determined by HCC, as Minerals Planning Authority. This is unlikely to occur until after the District Plan has been agreed for public consultation. While this is discussed in further detail in respect of Minerals issues, below, in respect of Green Belt issues, it should be noted that, should permission be granted for extraction, then the landform of the application area would be subject to significant alteration as part of the process of extraction. This would not only result in a change in the landscape from its existing appearance during extraction, but restoration could potentially lead to a differing profile with lower related land levels in this location. The opportunity would then present itself to better minimise the impact of development over that which would occur at current land levels. This would also allow for significant appropriate screening of any development to occur as part of this approach with a strong Green Belt boundary then being created in this location.

### Green Belt Conclusion

- 6.104 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, there is 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 land parcel to the North of Hertford would not in itself suggest that, beyond the nursery site, the land contained in this parcel would be suitable for Green Belt release. However, it should be noted that the 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.

- 6.105 Furthermore, as the landform in this area could be subject to change if mineral extraction occurs in this location, then circumstances would allow for the creation of a strong Green Belt boundary.
- 6.106 Therefore, on balance, it is considered that, in order to allow for an urban extension to the sustainable settlement of Hertford (which is the second 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 in amending the town's boundaries.

#### Transport – Policy HERT4: North of Hertford

- 6.107 As detailed earlier in this Settlement Appraisal, HCC Highways has reviewed its position in relation to development in Hertford as more up to date evidence, particularly in respect of impact on the A414, has become available.
- 6.108 It is now the case that there is no in-principle objection to development of up to 150 dwellings in this location at a strategic scale, but development above that level would be objected to, due constraints on the A602, in addition to concerns that congestion could be exacerbated in the town centre and the A414. However, it should be noted that, in respect of the 150 dwellings, detailed matters pertaining to access and the potential need to contribute to wider strategic improvements to mitigate impact of development remain to be addressed through the planning application process. It is not considered at this stage that any such matters would prove to be of particular concern.

#### Foul Water Drainage – Policy HERT4: North of Hertford

- 6.109 Development to the north of Hertford would require upgrades to the sewerage system and these are considered to be deliverable through the development of the sites.

#### Surface Water Flooding – Policy HERT4: North of Hertford

- 6.110 Where there is evidence of surface water flooding issues that would need to be addressed, mitigation will be required. This would be achieved through successful planning of the development. There would be the potential to integrate sustainable urban drainage (SuDS) features into the landscape via incorporation into multi-functional green spaces in place of standard engineered solutions.



## Minerals – Policy HERT4: North of Hertford

- 6.111 As detailed above, a minerals application has been submitted to HCC, which is currently understood to be due for determination in September 2016.
- 6.112 As far as current minerals policy is concerned, the area immediately to the north of the proposed site allocation lies within adopted Minerals Local Plan 2007, Preferred Area No.2 and this Plan, along with the NPPF, is the policy framework within which the application would be determined.

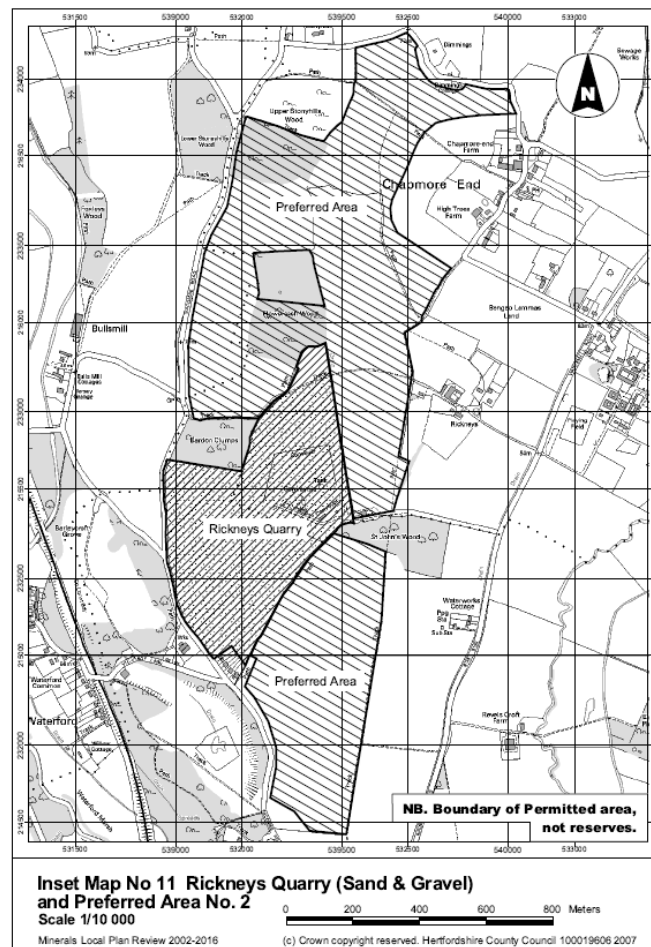


Figure 8: Minerals Local Plan 2007, Preferred Area No.2

- 6.113 However, it should be noted that the Minerals Local Plan is currently in the process of being reviewed and that, as part of this, HCC has been undertaking a site selection study. It is understood that the existing sites and preferred areas will in themselves be subject to review through this process. At present, the timetable for publishing the draft Minerals Plan is anticipated to be in the autumn of this year.

## Minerals Conclusion

- 6.114 Given the current position, at time of writing, in respect of the Minerals application being undetermined and the policy review position, it is not clear at this stage whether minerals extraction in this location will proceed.
- 6.115 However, as HCC, in its capacity as Minerals and Waste Authority, would not be likely to 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, this matter is of importance to be factored into delivery timelines.
- 6.116 In this respect, and from current understanding of the site promoter's intentions, it would be expected that development would swiftly follow extraction in the area immediately to the north of the site. This would enable development to complete in the overall HERT4 area by 2027.
- 6.117 Irrespective of the wider mineral extraction issue, there may be opportunity to utilise any gravel extracted in the construction process on site. There would therefore be a requirement for further investigative work to be undertaken through the planning process.

## Heritage Assets – Policy HERT4: North of Hertford

- 6.118 There are no listed buildings lying directly within the overall site area and the area lies outside the Conservation Area; however, this immediately abuts the site as the contiguous allotments are included within the boundaries.

## Wildlife – Policy HERT4: North of Hertford

- 6.119 While there are no designated Wildlife Sites within the proposed site allocation, there are two wildlife sites to the west of the site:

### *59/015 Great Mole Wood*

- 6.120 This area comprises ancient semi-natural oak/hornbeam woodland situated on a steep gravel escarpment running parallel to the River Beane. The ancient woodland includes 18 woodland indicator species.

### *59/062 Waterford Heath (South)*

- 6.121 This Wildlife Site, which is also a Local Nature Reserve, consists of bare ground, scrub, woodland, grassland and standing open water.

6.122 Both Wildlife Sites are of individual character and quality and, while not included within the proposed allocation, development proposals will need to demonstrate that these will not be compromised, and mitigation can be achieved, where appropriate.

### **Stakeholder Engagement – Policy HERT4: North of Hertford**

6.123 A HERT4 North of Hertford Proposed Allocation Partnership Group Meeting was held on 9<sup>th</sup> June 2014. In addition to East Herts Council Officers, site promoters and agents, the following stakeholders were represented:

Thames Water  
NHS England/NHS Hertfordshire  
Herts County Council (HCC): Highways;  
Passenger Transport;  
Education;  
Minerals and Waste; and  
Property.

The main purpose of the meeting was to discuss outstanding issues regarding the two site locations and encompassed both site specific matters and, where appropriate, wider strategic issues. The following matters were particularly relevant to the HERT4 area:

#### **Education**

6.124 At the point of the 2014 meeting, which was prior to the finalisation of plans and subsequent opening of the all-through school facility at Simon Balle, in respect of primary provision, HCC identified that the Simon Balle expansion would be required to support the pupil yield of the existing community.

6.125 Therefore, it was likely that development to the north of Hertford would generate additional need for educational provision. Expansion of Bengoe school could be investigated, but was not able to be confirmed at that time.

6.126 Contributions would be expected from developers towards primary and secondary education.

#### **Highways**

6.127 The matter of the A414 being close to capacity, and the impact of additional trips on that route, was the main issue of concern combined with the need for a solution to be identified at the strategic level. Local issues, in particular the effect that development would have on the Old Cross junction, were also raised as other specific concerns.

## **Passenger Transport**

- 6.128 Matters regarding bus and train provision were discussed at the meeting. A particular concern was to ensure that development in this location would not cause further problems in respect of delays caused to bus services because of congestion from Bengoe through the town.

## **Waste Water**

- 6.129 The site would drain to Rye Meads Sewage Treatment Works (STW) which currently serves a population catchment of over 400,000 people in the wider area.
- 6.130 A Water Cycle Study undertaken in 2008/9 forecast growth and the consequential impact on Rye Meads STW; however, the growth was not realised due to the downturn in housing development. The predicted capacity limitation dates within the study will effectively move forward; however, ongoing works to change the way the sewage is treated have provided 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.
- 6.131 In terms of site specifics, it was explained that the sewerage would move down the hill to the River Lea connection where the sewerage system is already stressed. There are some problems near to the river in terms of flooding but in general the existing system would be adequate. Modelling would be required to be undertaken to ascertain what improvements to the system would be required.

## **Minerals and Waste**

- 6.132 Due to the site's proximity to the identified preferred area further to the north, there was a need to safeguard minerals in the area.

## **Wildlife Sites**

- 6.133 It was confirmed that site studies were being undertaken by the Herts and Middlesex Wildlife Trust, subject to a prioritised programme. Surveys would be undertaken on designated wildlife sites on or in the vicinity of proposed development locations.

## Developer Meetings and Information

6.134 Since the Partnership Group Meeting, two meetings have taken place with site promoters. These were largely to discuss matters pertaining to mineral extraction and Green Belt boundary issues. Communication has been ongoing in respect of exchange of appropriate information between site promoters and the Council.

6.135 The need to prepare Statements of Common Ground for Examination purposes has been agreed with both sub-site promoters and these will continue to be progressed.

## Land uses and Proposals – Policy HERT4: North of Hertford

6.136 The site is proposed for residential development of around 150 dwellings to be split across the two sub-sites – 50 on the nursery site which fronts Sacombe Road, and 100 to the north and west of that area on a contiguous site. This reflects the same position as the Preferred Options Consultation.



Figure 9: Land to North of Hertford – Illustrative conceptual masterplan provided by site promoters (Ware Park Estates) – not binding on the Council

## Infrastructure Needs

6.137 The infrastructure requirements of bringing forward development in this location are identified below:

- Affordable Housing ;

- mineral extraction requirements
- new utilities, including, inter alia: integrated communications infrastructure to facilitate home working;
- upgrades to the sewerage system;
- sustainable drainage and provision for flood mitigation;
- local highways mitigation measures(with contributions towards wider, strategic, measures);
- sustainable transport measures, both through improvements to existing bus services, 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;
- 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;
- quality local green infrastructure through the site including opportunities for preserving and enhancing on-site assets, maximising opportunities to link into existing assets and enhance biodiversity;
- measures to ensure that any impact on wildlife within the site and at the nearby Waterford Heath nature reserve is successfully mitigated;
- all necessary on-site and appropriate off-site infrastructure.

## **Implementation**

- 6.138 The overall area comprises two separate land ownerships, which are capable of being delivered independently of one another. Each would be likely to require separate vehicular access points, with the Nursery Site for 50 dwellings utilising Sacombe Road and the access for the larger site for 100 dwellings achieving access via the B158 Wadesmill Road.
- 6.139 While each site is anticipated to be delivered in separate time periods, as part of the overall design, pedestrian and cycle access between the two sites should be ensured.
- 6.140 The Nursery Site is expected to be completed within the first five years of the Plan, by 2022, and the remaining area to be completed within the next five years, by 2027.

## **Policy HERT5: South of Hertford**

### **Introduction**

- 6.141 At the Preferred Options Stage, Land to the South of Hertford was proposed for the delivery of 50 new homes to the west of Mangrove Road, which

would consolidate the built form between Mangrove Drive/Oak Grove and Ashbourne Gardens.

### **Consultation Responses – Policy HERT5: South of Hertford**

6.142 A number of comments were received in respect of draft Policy HERT2 at the 2014 Preferred Options Consultation stage.

6.143 The main issues raised related to (in no particular order):

- traffic impact/congestion in locality, including Mangrove Road and A414;
- objection to loss of Green Finger;
- development of this site setting precedent for other development in the area;
- need to preserve rural nature of Mangrove Road;
- concern over wildlife impacts;
- type and mix of development should be appropriate for the area;
- surface water flooding concerns;
- educational capacity; and
- need to allow potential opportunity to extract mineral deposits for use on site.

### **Technical Assessments – Policy HERT5: South of Hertford**

6.144 The following sections summarise the technical evidence based assessment that has been undertaken since the Preferred Options consultation to assess site HERT4 alongside the wider Plan preparation process.

#### East Herts Green Belt Review, 2015 – Policy HERT5: South of Hertford

6.145 As stated above, at paragraph 3.1, the 2015 Green Belt Review assessed 14 parcels within and around Hertford. In respect of draft policy HERT5, South of Hertford, one parcel of land falls within this overall area (parcel 23).



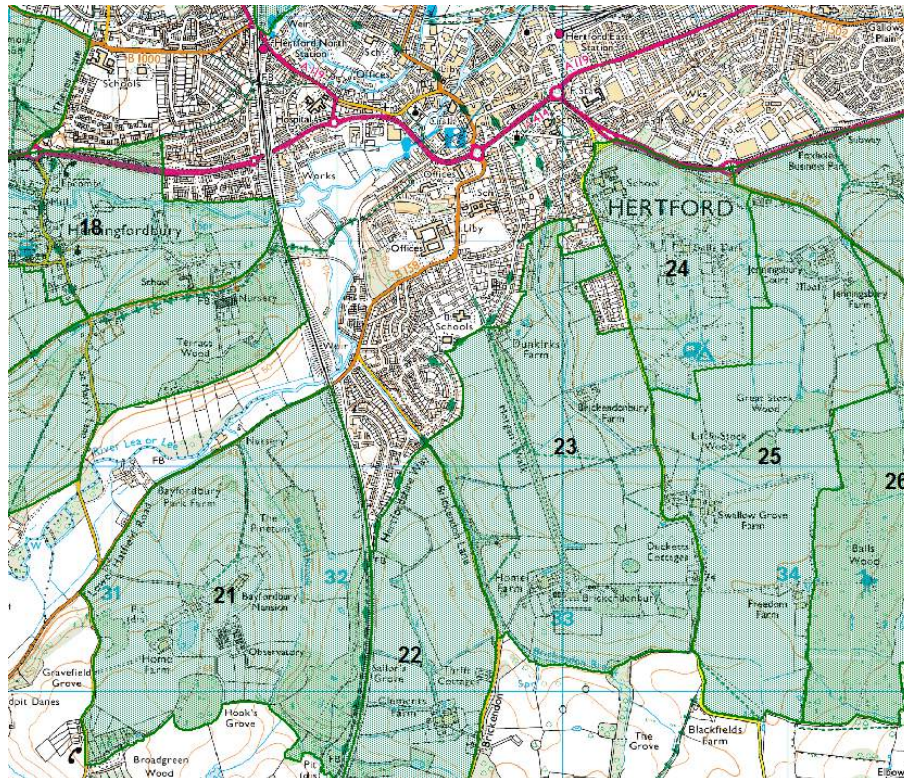


Figure 10: East Herts Green Belt Review Parcels identified by PBA for land to the South of Hertford

- 6.146 Parcel 23 was considered to have ‘low suitability’ as an Area of Search for development. The full assessment of each area can be found at pages 41 to 43 of the Green Belt Review, which can be viewed via the following link: <http://www.eastherts.gov.uk/greenbeltreview2015>.
- 6.147 The Study considered that the parcel overall: was of ‘Major importance in checking the unrestricted sprawl of large built-up areas’; was of ‘No’ importance in preventing neighbouring towns merging’; was of ‘Major in safeguarding the countryside from encroachment’; and made ‘Moderate 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.
- 6.148 However, while the above details the parcel in terms of its overall rating for the whole of the area covered, it should be noted that specific mention is made of the proposed development area:

Discreet valley and pocket of land in north eastern part where Oak Grove comprises a small residential estate separated from the urban are by a redundant playing field (both within Green Belt). The residential estate does not contribute to the openness of the Green Belt and so could be removed with no significant adverse effect on the integrity of the Green Belt in this location. To create a rational boundary this would also require removal of the intervening disused



playing field. Whilst this would lead to a reduction in openness, it would not have a significant effect on the integrity of the Green Belt due to the well-contained nature of the field.

## **Identification of Site Constraints – Policy HERT5: South of Hertford**

### Green Belt – Policy HERT5: South of Hertford

6.149 The above section details the findings of the Green Belt Review in respect of this site area. The conclusions of the Study in respect of overall suitability of the land proposed for development as an Area of Search are that, while the overall parcel would have low suitability, the proposed site allocation is suggested to be removed from the Green Belt to provide a rational boundary.

### Green Belt Conclusion

6.150 Taking the above into account, and as the Green Belt Review would itself support the removal of the HERT5 site as part of the rationalisation of the Green Belt boundary in this location, there are not considered to be any impediments to the development of the site in Green Belt terms

### Hertford's Green Fingers – Policy HERT5: South of Hertford

6.151 Hertford benefits from having 'Green Fingers' that are aligned with the routes of the four rivers (and their associated wetlands) which penetrate the built-up area of the County town. Hertford Civic Society has produced two reports on these valuable resources, in 1976 and 2004. East Herts Council has long supported the protection of these unique assets, particularly through local planning policy approach. While recognising that the Inspector's Report to the last Local Plan Inquiry deleted the then proposed policy in the currently adopted Local Plan, 2007, and further questioned a formal designation when other national policies would offer the necessary level of protection, the currently adopted Proposals Map was able to retain the designation for that plan period.

6.152 Since that time, the NPPF has introduced a new policy allowing local communities to identify green areas of particular importance to them for special protection, by designating land as 'Local Green Space'. This policy allows protection of such areas with development only occurring where very special circumstances apply. Taking all of this into account, the District Plan proposes that the Green Fingers will no longer have their own named designation, but rather (along with areas in Bishop's Stortford) will receive continued protection via Policy CFLR2 Local Green Space and these areas will be denoted as such on the Policies Map.

6.153 Policy HERT5 would involve development on a small area of the Green Finger in the Mangrove Road area. As noted above, the Green Belt Review considered that the removal of the HERT5 site and adjacent existing Mangrove Drive and Oak Grove would provide a rational Green Belt boundary in this location. In this respect it is considered that, as development of the HERT5 site would not intrude into the valley but would serve to consolidate the line of the existing built form in the area, this would not compromise the integrity of the Green Finger overall. The boundary of the CFLR2 designation would therefore follow the Green Belt boundary in this respect. While Policy HERT5 would seek to allow public access to land within the Green Finger, it is important to note that this area (which would be for informal use only) would remain in both the Green Belt and CFLR2 policy areas.

#### Transport – Policy HERT5: South of Hertford

6.154 As detailed earlier in this Settlement Appraisal, HCC Highways has reviewed its position in relation to development in Hertford as more up to date evidence, particularly in respect of impact on the A414, has become available.

6.155 HCC has confirmed that there is no in-principle objection to development of 50 dwellings in this location. However, it should be noted that detailed matters pertaining to access and the potential need to contribute to wider strategic improvements to mitigate impact of development remain to be addressed through the planning application process. It is not considered at this stage that any such matters would prove to be of particular concern.

#### Heritage Assets – Policy HERT5: South of Hertford

6.156 There are no listed buildings lying directly within the overall site area, but Grade I Balls Park and its Grade II Registered Garden is located within close proximity.

6.157 The HERT5 area currently lies within the Hertford Conservation Area; however, this part is under review with a public consultation recently concluded. Therefore, dependent on the Council's final consideration of matters raised, this designation may be subject to change in the future

6.158 The HERT5 policy area would therefore need to ensure that these heritage assets are fully taken into account and respected in development proposals.

## Wildlife – Policy HERT5: South of Hertford

- 6.159 While there are no designated Wildlife Sites within the proposed site allocation, there are two wildlife sites in the locality of the site:

### 59/107 Pond in Grassland, west of Balls Park

This area comprises a pond and surrounding area of associated habitat including open water, standing water and neutral grassland.

### 59/111 Valley Close Area

This wildlife site includes buildings and surrounding habitat in the built up area and woodland.

- 6.160 Both Wildlife Sites are of individual character and quality and, while not included within the proposed allocation, development proposals will need to demonstrate that these will not be compromised, and mitigation can be achieved, where appropriate.

## **Stakeholder Engagement – Policy HERT5: South of Hertford**

- 6.161 A South of Hertford (HERT5) Project Group Meeting was held on 9<sup>th</sup> June 2014. In addition to East Herts Council Officers, site promoters and agents, the following stakeholders were represented:

Herts County Council (HCC):      Highways;  
   Passenger Transport;  
   Education; and  
   Property.

The main purpose of the meeting was to discuss outstanding issues regarding the site location and encompassed both site specific matters and, where appropriate, wider strategic issues. The following matters were particularly relevant to the HERT4 area:

### **Education**

- 6.162 At the time of the meeting, which was prior to the finalisation of plans and subsequent opening of the all-through school facility at Simon Balle, in respect of primary provision, HCC identified a significant pressure for places.
- 6.163 Likewise, increased demand for secondary school places in the Hertford and Ware School Planning area was expected in the following 18 months after the meeting.

- 6.164 Contributions would therefore be expected from developers towards primary and secondary education.

### **Transport**

- 6.165 The matter of the A414 being close to capacity, and the impact of additional trips on that route, was the main issue of concern combined with the need for a solution to be identified at the strategic level.

- 6.166 Local issues, in particular the effect that development would have on the Mangrove Road area, were also raised as other specific concerns.

### **Waste Water**

- 6.167 Whilst Thames Water was unavailable to be represented at the meeting, it was confirmed post meeting the site would drain to Rye Meads Sewage Treatment Works (STW) which currently serves a population catchment of over 400,000 people in the wider area

- 6.168 The Water Cycle Study that was undertaken in 2008/9 had previously forecast growth and the consequential impact on Rye Meads STW; however, the growth was not realised due to the downturn in housing development. The predicted capacity limitation dates within the study will effectively move forward; however, on-going works to change the way the sewage is treated have provided 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. However, it is important to note that the overall impact and treatment requirement could not be fully predicted at that time as the cumulative effects of development from all the adjacent local authority areas also served by Rye Meads was not fully defined.

### **Developer Meetings and Information**

- 6.169 At the date of writing, no meetings have been held with site promoters since the Partnership Group Meeting. However, communication has been ongoing in respect of exchange of appropriate information between site promoters and the Council.

- 6.170 The need to prepare a Statement of Common Ground for Examination purposes has been agreed with the site promoter and this will continue to be progressed.

## Land Uses and Proposals – Policy HERT5: South of Hertford

- 6.171 The site is proposed for a residential development of around 50 dwellings. This reflects the same position as the Preferred Options Consultation.



Figure 11: Land to South of Hertford – Illustrative conceptual masterplan provided by site promoters – not binding on the Council

### Infrastructure Needs

- 6.172 The infrastructure requirements of bringing forward development in this location are identified below:

- Affordable Housing;
- mineral extraction requirements;
- new utilities, including, inter alia: integrated communications infrastructure to facilitate home working;
- local highways mitigation measures (with contributions towards wider, strategic, measures);
- sustainable transport measures, both through improvements to the existing walking and cycling networks in the locality and through new provision, which should also provide links with the adjoining area and the town centre (including, inter alia, an upgraded pedestrian and cycle way along Mangrove Road to Simon Balle School) and enhanced passenger transport services;
- 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;

- quality local green infrastructure through the site including opportunities for preserving and enhancing on-site assets, maximising opportunities to link into existing assets and enhance biodiversity, including, *inter alia*, the provision of a public amenity greenspace buffer (which will remain in the Green Belt) between the development and Hagsdell Stream;
- all necessary on-site and appropriate off-site infrastructure.

## Implementation

6.173 The site is in single land ownership and is expected to be delivered within the first five years of the Plan, by 2022.

## 7 Consideration of Alternative Sites

7.1 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 Hertford in the areas to the West, North and South of the town (N.B. As the Mead Lane policy area is a brownfield site located within the urban area and already covered by an extant policy within the 2007 Adopted Local Plan, it is not intended that an alternative for this site should be explored).

7.2 Assuming that land in these locations would be suitable in principle for development, it is also necessary to consider whether there would be any alternative location/s in and around the town of Hertford which would have the ability to better accommodate a similar amount of development that these sites would deliver (i.e. 750 dwellings). 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 Hertford area and the forms of development proposed.

7.3 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; not already subject to the grant of planning permission (and would therefore count as commitments); or already included within the proposed allocated site areas. 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 may 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 21<sup>st</sup> July 2016.

### **03/003 – Land north of Molewood Road.**

- 7.4 This submission proposes residential development over 0.47ha to the west of the town. The site is located within the Green Belt and does not lie within any of the Areas of Search considered through the sieving process.
- 7.5 As stated in the SLAA assessment, this greenfield site is located immediately to the east of the railway line, and is poorly related to the main built up area, not being contiguous with existing development. The site is located within the Green Belt and also forms part of a green finger, where development would compromise the objectives of maintaining openness in this location. . Taking into account all of the above, the site is considered unsuitable for development.

### **03/004 – Land east of North Road.**

- 7.6 This submission proposes residential development over 3.04ha to the west of the town. The site is located within the Green Belt and does not lie within any of the Areas of Search considered through the sieving process.
- 7.7 As stated in the SLAA assessment, this greenfield site is located to the west of the railway line and adjacent to Goldings Estate Historic Park and Garden. The site is wholly located with Flood Zone 3. The majority of the site is also located within the Green Belt and within a Green Finger, where development would compromise the objectives of maintaining openness in this location.
- 7.8 It should be noted that, in respect of a previous submission of the site, the Inspector to the 2007 adopted Local Plan stated that the site “comprises a valuable part of the wider area of Green Belt, preventing the northward sprawl of Hertford”. In consideration of all of the above, development in this location is considered unsuitable.

### **03/006 – Land adjacent to London Road.**

- 7.9 This greenfield area of 2.34ha is located in the Green Belt to the south of Hertford, immediately east of the A414 within Sub-Area B of Area of Search 13. The site forms part of a green finger and is located within the Green Belt. Part of the site is also covered by a TPO (No. 275). As such, the site is considered unsuitable for development.

### **03/007 – The Old Orchard.**

- 7.10 Proposed for residential development, this site of 0.29ha is located within the settlement boundary to the west of the town to the north of the A414. This greenfield site, whilst located within the built up area of Hertford, is covered

by a blanket TPO (No 403) and as such is considered unsuitable for development.

### **03/008 – Hertford Fire Station & Fire Service HQ.**

7.11 This brownfield area of 0.59ha is proposed for residential development and is located within the settlement boundary, east of the A414. While the site could potentially be suitable for development, this would be subject to the relocation of the Fire Station and other uses which operate on the site. Currently, the site cannot be considered available; however, should relocation of the blue lamp uses be identified in the future and an acceptable scheme for redevelopment submitted, the site would be brought forward as part of 'windfall development', which Hertford is expected to contribute towards.

### **03/009 – West Street Allotments.**

7.12 This area of 0.45ha is proposed for residential development and is located to the south west of the town within the settlement boundary and is currently in use as allotments. However, while the site is considered to be well related to existing development and could potentially be suitable for development of around 14 dwellings, this would be subject to the relocation of the allotment use and therefore the area cannot currently be considered available.

### **03/016 – 1-14 Dicker Mill.**

7.13 This area of land, which is proposed for residential development, comprises 0.45ha and is a brownfield site located within the settlement boundary, adjacent to the River Lea. The site is designated as part of the Mead Lane Employment Area. While it is proposed that part of the Mead Lane area be brought forward for development as part of the District Plan, that particular area is largely a long-vacant, dilapidated site where the provisions of the Mead Lane Urban Design Framework seek to regenerate this key location.

7.14 Given the highway access constraints of the area and the limitations to additional vehicle movements in the area, development proposals need to be within the thresholds dictated within the Mead Lane section of the Hertford and Ware Urban Transport Plan. Consequently, redevelopment of the Dicker Mill site for residential purposes would likely be at the expense of development in the Mead Lane Urban Design Framework area, and thus would potentially compromise the viability of that area and its potential to bring forward significant sustainable transport initiatives into the area.

7.15 Furthermore, the findings of the Hertford and Ware Employment Study, conclude that, where not required for release to meet housing need,



remaining Employment Sites in the towns should be protected. It is therefore the view of Officers that development of this site should not be supported.

**03/017 – 30-34 and 33-41 Chambers Street.**

7.16 Residential development is proposed for this area of 0.25ha, which is a brownfield site located within the urban area of the town within the settlement boundary. While not allocated as an Employment Area, it is in current employment use, where the current adopted Local Plan (Policy EDE2) and draft District Plan (Policy ED1) seek to retain such uses. It is therefore the view of Officers that the development of this site should not be supported.

**03/019 – Goldings Manor**

7.17 This site comprises 40.47ha proposing a residential, community, leisure/recreation, employment, mixed use development in the grounds of Goldings, which lies within Area of Search 12, Sub-Area A, which failed the first stage of sieving process and was not carried forward to latter assessment stages.

7.18 Not only does this large greenfield site form part the Goldings Estate Historic Park and Garden it is also poorly related to the village of Waterford. The majority of the site is identified as an area of protected open space and the total area is located within the Green Belt. As such Officers consider that this area is unsuitable for development.

**03/020 – Land at Braziers Field**

7.19 This area of 0.59ha is located within the settlement boundary on a steep site to the south of Woodlands Road and is proposed for residential use. While the site is heavily treed and the topography of the site could be challenging due to its steep sloping nature, it is considered to be potentially suitable for development. Given the small size of the site, it is not considered appropriate to bring this forward as a strategic allocation, but, if topographical and access challenges prove surmountable, it could be brought forward as a windfall proposal.

**03/021 – Goldings, Orchard House**

7.20 This site comprises 1.37ha proposing residential development in the grounds of Goldings, which lies within Area of Search 12, Sub-Area A, which failed the first stage of sieving process and was not carried forward to latter assessment stages.

7.21 Not only does this site form part the Goldings Estate Historic Park and Garden, it is also located within the Green Belt and isolated from the built up area of Hertford. As such Officers consider that this area is unsuitable for development.

#### **03/022 – Chelmsford Lodge**

7.22 This site comprising 1.54ha is located within the Green Belt outside of the settlement boundary and is proposed for residential use. Notwithstanding the site being well related to existing urban area, the whole of it is covered by a blanket TPO (No 4). As such Officers consider this site unsuitable for development.

#### **03/024 – Hertford Delivery Office**

7.23 This brownfield area of 0.42ha is located within the settlement boundary, to the west of the A414 and is proposed for residential development. While the site could potentially be suitable for development, this would be subject to the relocation of the Delivery Office which currently operates on the site. Therefore, while the site cannot be considered available, should relocation of the Delivery Office be identified in the future and an acceptable scheme for redevelopment submitted, the site would be brought forward as part of 'windfall development', which Hertford is expected to contribute towards.

#### **03/025 – Land west of Mangrove Road**

7.24 This area of 2.76ha is a greenfield site 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 for development and Officers do not support it as an allocation.

#### **03/111 – Land east of Marshgate Drive (residual part of employment area)**

7.25 This site of 7.47ha is located within the settlement boundary within the existing Mead Lane Employment Area and is proposed for Employment use. Given the fact that this site is already in active use for the use proposed and benefits from policy protection as a designated Employment Area, no change is proposed to this area.

### **03/134 – Land south of Hornsmill Road**

- 7.26 This area of 15.6ha, proposed for residential use, is a large greenfield site located within the Green Belt to the south of Hertford which lies within Area of Search 12, Sub-Area A. This Sub-Area failed the first stage of sieving process and was not carried forward to latter assessment stages. It is considered that the railway line forms a strong Green Belt boundary in this location and this should not be breached by development. In addition, development would be poorly related to the existing urban area and would result in an unacceptable incursion into the countryside. As such, Officers consider that this site is unsuitable for development.

### **03/153 – Land east of Queens Road**

- 7.27 This greenfield site of 1.95ha is located within the Green Belt to the south of Hertford which lies within Area of Search 12, Sub-Area C. While this Sub-Area was rated a Marginal Fail at the first stage of sieving process and was carried forward to latter assessment stages, Chapter 6 of the Supporting Document notes that, other than the former Christ's Hospital Playing Field (currently proposed for allocation under Policy HERT5), development within the Sub Area would "be considered to have a significant detrimental impact on the Hertford Green Finger, with the land East of Queens Road particularly affecting the land around the Hagsdell Stream area".
- 7.28 Officers therefore consider that, as 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, the site is not suitable for development.

### **03/156 – 6-10 Marshgate Trading Estate**

- 7.29 This area of land, which is proposed for mixed use development, comprises 0.69ha and is a brownfield site located within the settlement boundary, adjacent to the River Lea. The site is designated as part of the Mead Lane Employment Area. While it is proposed that part of the Mead Lane area be brought forward for development as part of the District Plan, that particular area is largely a long-vacant, dilapidated site where the provisions of the Mead Lane Urban Design Framework seek to regenerate this key location.
- 7.30 Given the highway access constraints of the area and the limitations to additional vehicle movements in the area, development proposals need to be within the thresholds dictated within the Mead Lane section of the Hertford and Ware Urban Transport Plan. Consequently, redevelopment of the Marshgate Trading Estate site for residential purposes would likely be at the expense of development in the Mead Lane Urban Design Framework area,

and thus would potentially compromise the viability of that area and its potential to bring forward significant sustainable transport initiatives into the area.

- 7.31 Furthermore, the findings of the Hertford and Ware Employment Study, conclude that, where not required for release to meet housing need, remaining Employment Sites in the towns should be protected. It is therefore the view of Officers that development of this site should not be supported.

### **03/157 – Hertford Industrial Estate**

- 7.32 This brownfield site of 2.9ha is located within the settlement boundary and is proposed for residential use. The site is a designated Employment Area and forms a key part of the local employment offer. It is also located adjacent to the Foxholes Business Park, which consolidates the employment offer in this area.

- 7.33 The findings of the Hertford and Ware Employment Study, June 2016, conclude that, where not required for release to meet housing need, remaining Employment Sites in the towns should be protected. It is therefore the view of Officers that the site is unsuitable for residential development.

### **17/002 – Land west of Brickendon Lane**

- 7.34 This large greenfield site, with an area of 24.89ha, is located within the Green Belt, to the south of Hertford, between the railway line and Brickendon Lane. The site within Area of Search 12, Sub-Area B, which failed the first stage of sieving process and was not carried forward to latter assessment stages. Development would represent an unacceptable incursion into open countryside, impacting on the openness of the Green Belt in this location and development would have the potential to negatively impact on Brickendonbury. As such, Officers consider that the site is unsuitable for future housing development.

## **8 Employment**

- 8.1 As detailed above, the Hertford and Ware Employment Study, June 2016, has recommended that existing designated Employment Areas in the two towns should be retained.
- 8.2 In respect of the two proposed new Employment Area designations in Hertford (Taylor Trading Estate and Pegs Lane/Hale Road/Gascoyne Way), the Study made specific observations.

- 8.3 Regarding the Taylor Trading Estate, the Employment Study recognised an element of vacancy and, although reasonably well occupied, low quality provision on the remainder of the site. Given the need for investment or refurbishment to make it more attractive, the Study considered that, in time, the Taylor Trading Estate may become more of a mixed use employment/residential area, rather than a B use class employment area. As other policies in the Plan, particularly EDE1, would continue to protect existing employment uses on the site, as appropriate, it is therefore considered that the proposed designation should not proceed to the Regulation 19 stage.
- 8.4 The Employment Study also commented on the proposed Pegs Lane/Hale Road/Gascoyne Way designation, noting that the area has been diluted since the Preferred Options Consultation stage and that the allocation should be redrawn. Therefore Officers opine that Sovereign House (permission granted for residential development), the Gates Garage (sui generis use with current application for residential development), and Hertford Police Station (which would then be isolated from the remaining area) should be removed from the proposed Employment Area designation.
- 8.5 Given the loss of small office accommodation in Hertford in recent years, the Study further commented on whether the County and District Councils should consider identifying land or buildings within their ownership for the re-provision of office workspace, probably with a focus on providing a business centre to cater for a range of smaller businesses requiring office space. It is the opinion of Officers that the designation of the area for primarily B1 use would not compromise the ability of either authority to have a flexible approach on the occupancy of the properties in the future should they so wish. It is therefore Officers' recommendation that the redrawn Employment Area, to be renamed 'Pegs Lane', should be included in the District Plan.

## **9 SA Objectives**

- 9.1 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, below, of proposed development in Hertford describes how the sites will meet the objectives as set out in the Sustainability Appraisal Framework.

### ***Air Quality***

- 9.2 There is an existing Air Quality Management Area (AQMA) in Hertford based on a part of the A414, Gascoyne Way. While none of the sites are in direct proximity to the AQMA, traffic emanating from development is likely to have some impact unless, or until, mitigation measures are introduced. Given this factor, and other constraints identified on the A414, development in Hertford should not significantly exceed that planned through the allocated sites, in order that the air quality issues in the area are not exacerbated.

### ***Biodiversity and Green Infrastructure***

- 9.3 Only one of the proposed four allocations is directly affected by the presence of wildlife sites (West of Hertford – as detailed above), although other allocations have designated sites of environmental importance in proximity to these locations. 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***

- 9.4 The proposed housing mix and tenure and range of community facilities will support all age ranges, including the needs of an ageing population. All four sites will, *inter alia*, provide financial contributions towards healthcare and education.

### ***Economy and Employment***

- 9.5 The development at Mead Lane will provide new employment opportunities for existing and new residents alike. While the three other sites will not directly provide new employment opportunities beyond the construction phase, Hertford has a variety of existing designated and non-designated Employment Areas, providing significant opportunities for employment.

### ***Historic Environment***

- 9.6 The proposed allocations at Mead Lane and the North of Hertford would have a minimal impact on the historic environment. Development to the West and South of Hertford will need to ensure that any potential impact on historic assets is minimised through design.

## ***Housing***

- 9.7 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***

- 9.8 The proposed allocation in the Mead Lane area is a brownfield site, where the majority of the area has been vacant for a long period of time. The proposed allocation to the North of Hertford would involve the redevelopment of a plant nursery for a third of the allocation with the remaining area greenfield. Development to the West of Hertford would involve partly despoiled land on the northern section of the allocation and a current greenfield site to the south, which is in agricultural use. The proposed allocation to the South of Hertford appears as a greenfield site, although it was historically used as a playing field for the Christ's Hospital School, before its closure in the 1980's.
- 9.9 Development of all four proposed allocations will be at appropriate densities that make efficient use of land while respecting the character of existing locales.
- 9.10 In respect of mineral deposits, 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***

- 9.11 Any significant impact on landscape quality is expected to be successfully mitigated through careful design and the use of landscape buffers and planting.

## ***Low Carbon Development***

- 9.12 Town centre services and facilities can be accessed by foot or bicycle from all the proposed development sites. For the latter two developments, town centre services are supplemented by local shopping parades and other community facilities in relative close proximity.
- 9.13 Development that exceeds sustainability standards contained within Building Regulations will be encouraged.

## ***Transport***

- 9.14 Sites to the North of Hertford and Mead Lane benefit from access within walking distance to Hertford North and Hertford East railway stations, respectively. Bus services will also be provided directly to the Mead Lane development and also in very close proximity to the sites to the North and West of Hertford. The South of Hertford site will involve a slightly longer walk to allow for access to the bus network.
- 9.15 Development in Hertford would increase the amount of car borne traffic using the A414, but HCC is confident that this element of growth can be supported, subject to mitigation measures. Other local junction improvements are also likely to be required, in particular in relation to the Mead Lane development.

## ***Water***

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

## **10 Conclusion**

- 10.1 The Settlement Appraisal for Hertford has demonstrated that, having considered all the reasonable alternatives, four sites should be proposed for allocation within the District Plan in order to deliver a total quantum of approximately 950 new homes.
- 10.2 Three sites of the four site allocations are currently located within the Green Belt. 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 Hertford, the three proposed sites are considered to be the most preferable, taking into consideration sustainability and Green Belt criteria in addition to impact on the unique 'Green Finger' assets.
- 10.3 All four 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. Improvements to local road junctions will help to mitigate the impact of increased traffic, while sustainable transport options will be delivered as part of development proposals for the Mead Lane site and those to the West and North of Hertford.



10.4 Taking all of the above into account, it is considered that a positive and sustainable strategy is presented for Hertford.

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## Chapter 7 Hertford

### 7.1 Introduction

- 7.1.1 The County town of Hertford lies at the confluence of four rivers in a valley setting, which in the past has influenced its shape and form. Hertford's boundaries are characterised by areas of open land which penetrate towards the centre of the town. These 'Green Fingers' are an environmental asset of value to local people and visitors alike. The town also benefits from many cultural and recreational facilities.
- 7.1.2 Hertford's town centre retains much of its medieval core, includes many buildings of historic significance, and has high townscape quality which, combined with its river setting, presents both opportunities and constraints in shaping its future development. The town offers an attractive environment for leisure and business purposes and, with its retail offer characterised both by major multiples and independent outlets, Hertford is classed as a Secondary Town Centre. The Hertford Town Centre Urban Design Strategy, 2016, seeks to build on this and includes proposals to improve the commercial viability and vitality of the central area and to further enhance the quality of the built environment. The redevelopment of the Bircherley Green centre will be a key part of this approach.
- 7.1.3 The town has good transport connections, including a bus station, providing access to both local and long-distance destinations, and two railway stations, offering services into London and wider locales. Despite good road links, traffic congestion in Hertford is acute at peak times, both within the historic core and especially on the A414 Gascoyne Way, which bi-sects the town. It is important to ensure that future development should not exacerbate this situation, and mitigating measures should be identified and delivered, where possible.

- 7.1.4 Good use has been made in the past of brownfield opportunities in the town and, despite this being a shrinking resource, the vacant former gas works site in the Mead Lane area presents a prime redevelopment opportunity and is expected to be brought forward for mixed use development. The Mead Lane Urban Design Framework (December 2014) will guide the approach to development in this location.
- 7.1.5 As there has been some loss of employment in the town in recent years, it is important that the town should seek to maintain and improve on its current provision, to both internalise trips within the Hertford and Ware area to minimise out-commuting, and also to encourage new businesses to locate to the County town.
- 7.1.6 The main components of the development strategy for Hertford are as follows:
- 7.1.7 **Housing:** a mix of dwelling types and sizes will be constructed in appropriate locations to ensure that Hertford's population will be 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 schemes will allow emerging households to be able to remain living in Hertford in accommodation suited to their needs.
- 7.1.8 **Education:** since the provision of an all-through school facility at Simon Balle in 2015 addressed a previous shortfall of spaces in Hertford, any future additional primary level educational needs of the town will be achieved via the expansion of existing facilities. Secondary educational provision in the Hertford and Ware Schools Planning Area will be enhanced via the provision of a new secondary school as part of development to the North and East of Ware, and, where appropriate, by the expansion of one or more of the existing schools in the Schools Planning Area .

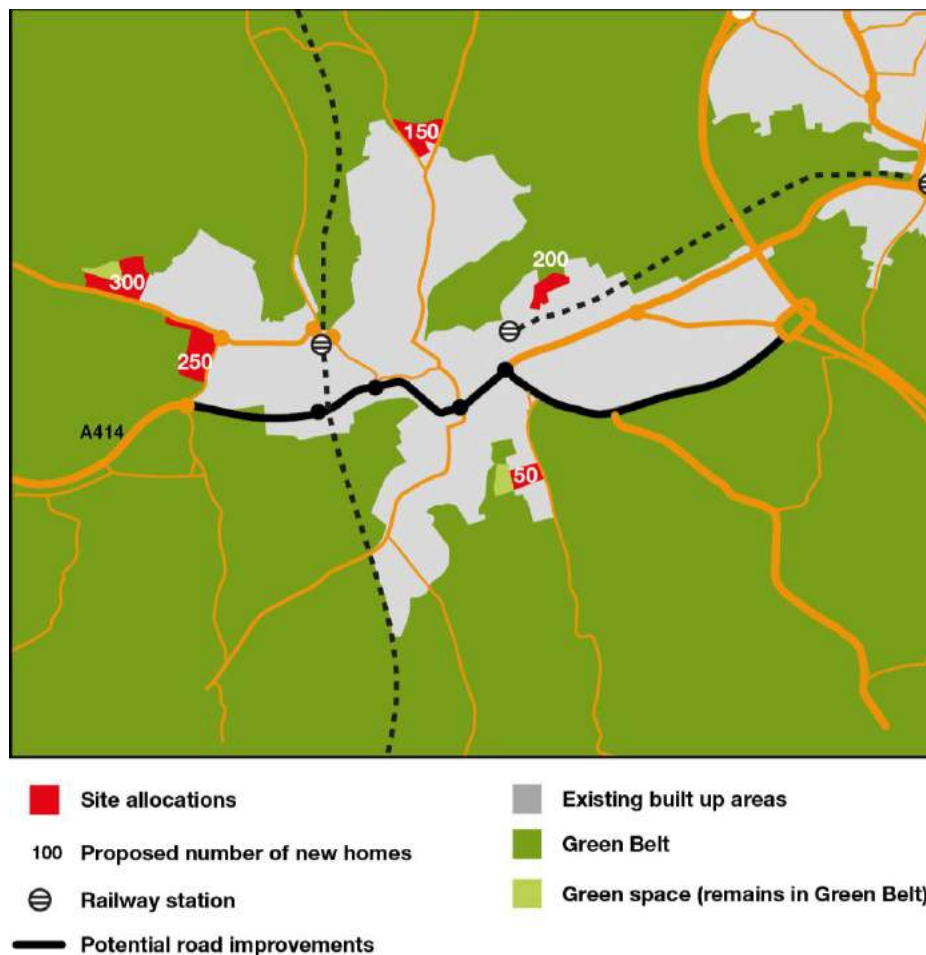
- 7.1.9 **Transport:** the provision of enhanced bus services to support travel to and from new urban extensions to the town will provide links with the two existing railway stations and the central bus station. New development will support improved sustainable travel and will aid delivery of initiatives contained in Hertfordshire's Local Transport Plan/Hertfordshire 2050 Transport Vision, and daughter documents, particularly those schemes detailed in the Hertford and Ware Urban Transport Plan (or in subsequent HCC transport policy documents). Mitigating measures will help ameliorate congestion, particularly on the A414.
- 7.1.10 **Other Infrastructure:** improved utility infrastructure, such as to wastewater networks, will support existing and new developments.
- 7.1.11 **Employment and Retail:** the Mead Lane Employment Area will be revitalised via the redevelopment of vacant areas to provide 3,000sqm of B1 employment floorspace, as part of a mixed use development (see also the Mead Lane Urban Design Framework, December 2014). Other existing Employment Areas in the town will be maintained and, where appropriate, modernised. Where possible, the current employment offer should be supplemented by the creation of additional jobs in suitable locations. The retail function of the town will be maintained and supplemented within the central core, in line with the provisions of the Hertford Town Centre Urban Design Strategy, 2016.
- 7.1.12 **Character:** Hertford will preserve its market town character and the quality of the town's historic core will be respected in new development proposals. Where development occurs in the town, this should ensure that the sense of place is created which allows for successful integration with existing features of character in the area. Where development involves river frontages, this will enable the provision of an enhanced setting and improvement of public access, as appropriate. The town's

green infrastructure, particularly Hertford's Green Fingers which provide unique character to the settlement, will be maintained and enhanced, as appropriate. Development will be expected to support the Panshanger Country Park, to enable protection of, and increased public access to, this valuable resource.

## 7.2 Development in Hertford

7.2.1 The main features of the policy approach to development in Hertford are shown on Figure 7.1 below:

Figure 7.1 Key Diagram for Hertford



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

## **Policy HERT1 Development in Hertford**

In accordance with Policy DPS3 (Housing Supply 2011-2033), Hertford will accommodate approximately 950 new homes, which will include:

- (a) 200 homes as part of mixed use development in the Mead Lane area, as set out in Policy HERT2 (Mead Lane Area);
- (b) 550 homes to the west of the town, in accordance with Policy HERT3 (West of Hertford);
- (c) 150 homes to the west of B158 Wadesmill Road, as set out in Policy HERT4 (North of Hertford);
- (d) 50 homes to the west of Mangrove Road, in accordance with Policy HERT5 (South of Hertford); and
- (e) a proportion of the overall windfall allowance for the District.

### **Development Sites in Hertford's Urban Area**

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

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

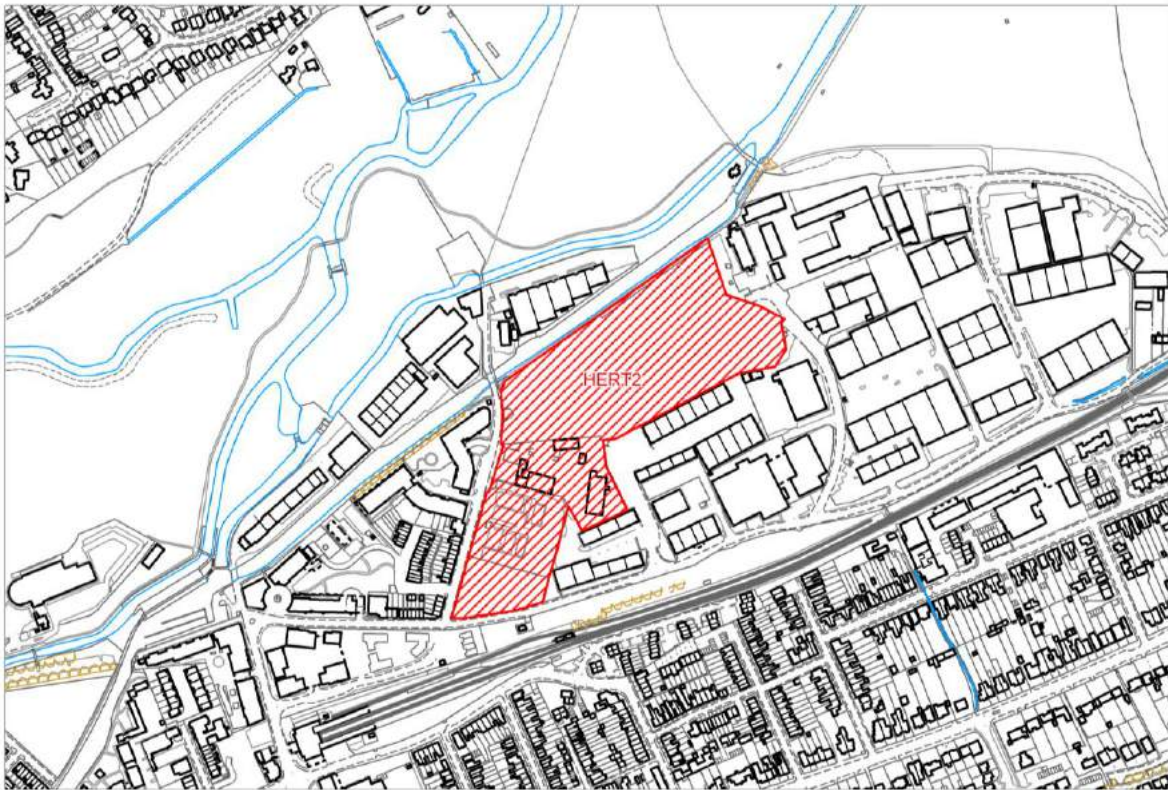
#### **Mead Lane Area**

7.2.5 In order to meet the District's short term housing requirement and to provide for the housing needs of Hertford, development of 200 dwellings in the Mead Lane area is proposed as part of mixed-use development.

7.2.6 The Mead Lane area offers a unique opportunity to regenerate underused employment land through high quality, mixed-use,

development which will revitalise this area and provide an enhanced river frontage. The Mead Lane Urban Design Framework, December 2014, sets parameters in terms of acceptable uses, necessary infrastructure, design, and other requirements, to support the redevelopment and revitalisation of the area. Any development in the Mead Lane area will therefore be subject to its provisions.

Figure 7.2 Site Location: The Mead Lane Area



### **Policy HERT2 Mead Lane Area**

I. Land in the Mead Lane Area, to the east of Marshgate Drive, is allocated to provide approximately 200 homes by 2027, as part of mixed-use development.

II. Subject to, and in accordance with, the provisions of the Mead Lane Urban Design Framework, December 2014, 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) delivery of 3,000sqm B1 employment floorspace which will provide appropriate opportunities to promote self-containment and sustainability and should also act as a buffer between existing employment uses and new residential provision;
- (d) quality local green infrastructure throughout the site including maximising opportunities for linking into and improving existing assets and enhancing biodiversity, especially along the river corridor;
- (e) necessary new utilities, including, *inter alia*: integrated communications infrastructure to facilitate home working;
- (f) sustainable drainage and provision for flood mitigation;
- (g) access arrangements and appropriate local (with contributions towards wider, strategic,) highways mitigation measures, which, *inter alia*, should include a link between Marshgate Drive and the existing spur road to the east of the site to facilitate pedestrian and cycle access and which should also complete the circulatory route to allow for the extension of bus routes into the area;
- (h) the widening of Marshgate Drive to allow for improved vehicular and pedestrian access and car parking/car share scheme to be delivered within a Green Streets approach;
- (i) encouragement of sustainable transport measures, both through improvements to the existing walking and cycling networks in the locality and through new provision, which should include, *inter alia*, a 3m pedestrian/cycleway to the south side of Mead Lane in addition to improvements to the towpath and links with the adjoining area and the town centre (in particular addressing links to Hartham Common and Kings Meads) and enhanced passenger transport services;

- (j) remediation of land contamination resulting from former uses;
- (k) public open space/s within the site, including the provision of a play area and opportunities for public art interventions and space for wildlife;
- (l) landscaping and planting, both within the site and peripheral, which responds to the existing landscape and complements development, as appropriate;
- (m) 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.

### **West of Hertford**

- 7.2.7 In order to meet the District's short term housing requirement and to provide for the housing needs of the town, development of approximately 550 homes is proposed on land to the west of Hertford.
- 7.2.8 Development of the area will need to ensure the enhancement of sustainable transport provision; the continued protection of Archer's Spring, Ancient and other woodland, wildlife, and other natural assets; and also respect and contribute to the Panshanger Country Park. The phasing of development will also need to ensure that any underlying mineral deposits within the site can be satisfactorily extracted as part of development.

Figure 7.3 Site Location: Land West of Hertford (North of Welwyn Road)

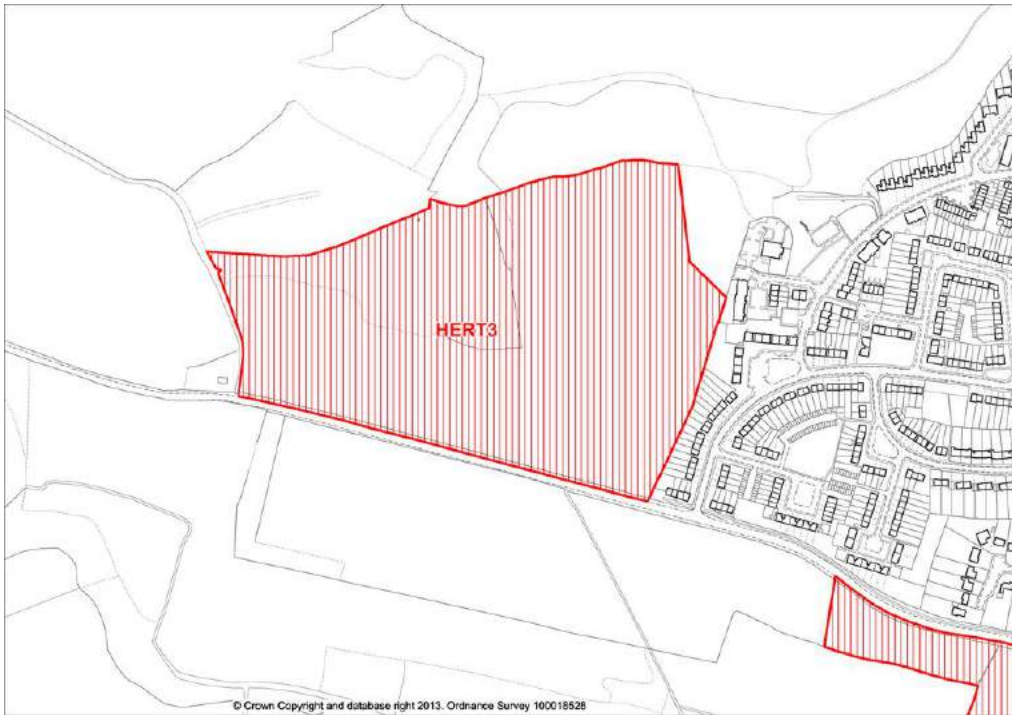
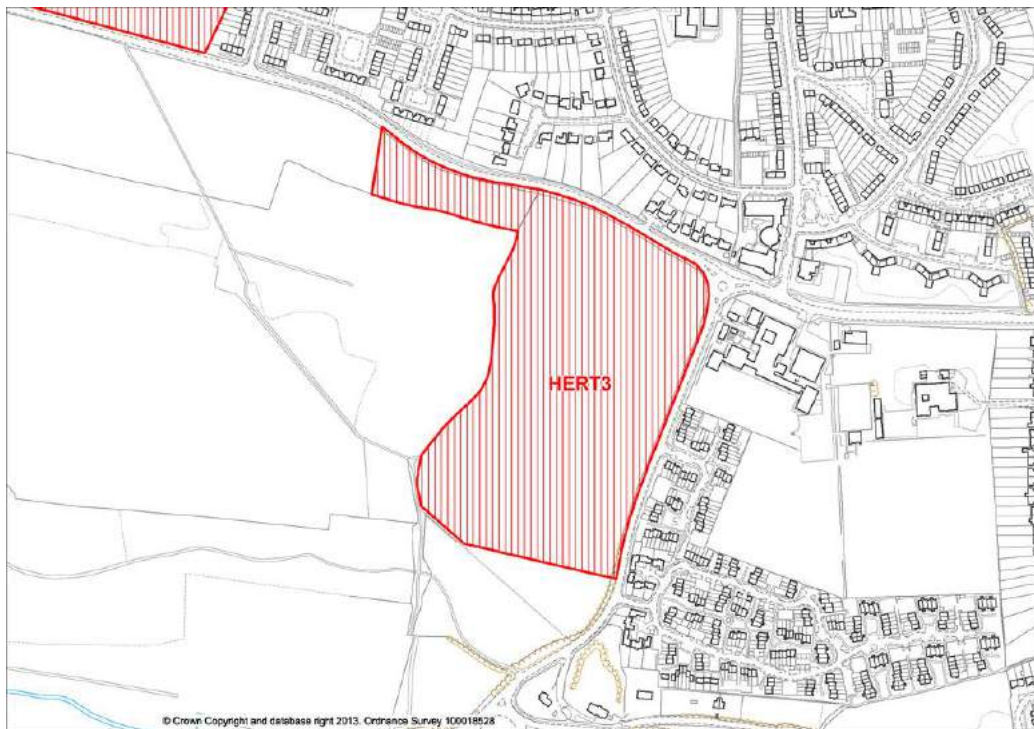


Figure 7.4 Site Location: Land West of Hertford (South of Welwyn Road/West of Thieves Lane)



## **Policy HERT3 West of Hertford**

I. Land to the west of Hertford is allocated as a residential site, to accommodate 550 homes by 2022, with 300 homes being provided to the north of Welwyn Road and 250 homes south of Welwyn Road/west of Thieves Lane.

II. The development of 300 dwellings to the north of Welwyn Road 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) 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;

(e) necessary new utilities, including, *inter alia*: integrated communications infrastructure to facilitate home working, and necessary upgrades to the sewerage system;

(f) sustainable drainage and provision for flood mitigation;

(g) access arrangements and appropriate local (with contributions towards wider, strategic) highways mitigation measures;

(h) 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 include, *inter alia*, the improvement of pedestrian and cycle access to Perrett Gardens and links from the Sele Farm estate to public footpaths and bridleways in the locality); shared use cycle/pedestrian way alongside Welwyn Road; enhanced passenger transport services (including, *inter alia*, improved service provision and the provision of new bus stops and shelters on B1000 Welwyn Road);

(i) protection of public rights of way and other public access routes running through or on the boundaries of the site;

(j) landscaping and planting, both within the site and peripheral, which responds to the existing landscape and complements development, as appropriate, including the provision of a suitable buffer between the development and existing woodland areas;

(k) 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;

(l) quality local green infrastructure through the site including opportunities for preserving and enhancing on-site assets, maximising opportunities to link into existing assets and enhance biodiversity including the protection of Local Wildlife Site 59/077; Archers Spring; and other woodland and wildlife interests in the area, including a suitable buffer between woodland and development;

(m) taking into account the contents of the 'Panshanger Park and its environs Heritage Impact Assessment, July 2016' and including measures to ensure that any impact on views affecting the Panshanger Country Park and Goldings are successfully mitigated;

(n) contributions towards the Panshanger Country Park;

(o) social infrastructure including contributions towards education, health services and other community facilities;

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

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

III. The development of 250 homes to the south of Welwyn Road/west of Thieves Lane 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) 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;

(e) necessary new utilities infrastructure including, *inter alia*: integrated communications infrastructure to facilitate home working, and necessary upgrades to the sewerage system;

(f) sustainable drainage and provision for flood mitigation;

(g) access arrangements and appropriate local (with contributions towards wider, strategic) highways mitigation measures;

(h) 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; shared use cycle/pedestrian way alongside Welwyn Road; enhanced passenger transport services (including, *inter alia*, improved service provision and the provision of new bus stops and shelters on B1000 Welwyn Road);

(i) protection of all public rights of way and other public access routes running through or on the boundaries of the site;

(j) landscaping and planting, both within the site and peripheral, which responds to the existing landscape and complements development, as appropriate, including, *inter alia*, the provision of a suitable buffer between the development and the existing woodland;

(k) taking into account the contents of the 'Panshanger Park and its environs Heritage Impact Assessment, July 2016' and including measures to ensure that development respects the relationship with this sensitive location. Such measures should include, *inter alia*, the creation of gateway landscaping to the south of the site, which protects key views into and from within the Panshanger Country Park and ensures that the development is successfully mitigated;

(l) contributions towards the Panshanger Country Park;

(m) 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;

(n) quality local green infrastructure through the site including opportunities for preserving and enhancing on-site assets, maximising opportunities to link into existing assets and enhance biodiversity including the protection of Local Wildlife Site 58/025; Ancient and other woodland and wildlife interests in the area, including a suitable buffer between woodland and development;

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

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

## North of Hertford

7.2.9 In order to meet the District's short and medium term housing requirement and to provide for the housing needs of the town, a development of up to 150 new homes is proposed to the North of Hertford.

7.2.10 As the phasing of development will need to ensure that underlying mineral deposits in the locality can be satisfactorily extracted and that such resource is not sterilised, 50 dwellings will be provided by 2022 on the Bengo Nursery site, with a further 100 dwellings provided by 2027, subject to the prior completion of minerals extraction on the adjoining site, where this would impact on the ability of the development to be delivered.

Figure 7.5 Site Location: Land North of Hertford





## **Policy HERT4 North of Hertford**

I. Land to the north of Hertford is allocated as a residential development site to accommodate 150 homes, with 50 dwellings being provided to the north of Sacombe Road by 2022; and, subject to the satisfactory previous phased extraction of mineral deposits on the neighbouring site, 100 homes to the west of B158 Wadesmill Road between 2022 and 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) 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;

(d) necessary new utilities, including, *inter alia*: integrated communications infrastructure to facilitate home working;

(e) necessary upgrades to the sewerage system;

(f) sustainable drainage and provision for flood mitigation;

(g) access arrangements and appropriate local (with contributions towards wider, strategic) highways mitigation measures;

(h) 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 and enhanced passenger transport services;

(i) protection of all public rights of way (including, *inter alia*, the protection of the restricted byway) and other public access routes running through or on the boundaries of the site;

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

(k) 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;

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

(m) measures to ensure that any impact on wildlife within the site and at the nearby Waterford Heath nature reserve is successfully mitigated;

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

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

## **South of Hertford**

7.2.11 In order to contribute towards the District's short term housing requirement and to provide for the housing needs of the town, development of approximately 50 dwellings is proposed to the South of Hertford.

7.2.12 The site provides an opportunity to deliver a range of housing types and tenures in a location that benefits from excellent access to educational facilities, historic assets, and other town centre amenities. Development of the area will ensure the continued protection of the Green Finger at the western part of the site, including the existing treed area at the higher level, the tree belt at the lower level, and the sloped area of land between them leading towards Hagsdell Stream, while allowing public access to this valuable resource.

Figure 7.6 Site Location: Land to the South of Hertford



### **Policy HERT5 South of Hertford**

I. Land to the south of Hertford is allocated as a residential development site to accommodate approximately 50 homes to the west of Mangrove Road 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) 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;

(d) development that is compatible with, and complements, the character of local heritage assets and designations, including, *inter alia*, the adjacent Grade I Balls Park and its Grade II Registered Garden;

(e) necessary new utilities including, *inter alia*: integrated communications infrastructure to facilitate home working;

(f) access arrangements and appropriate local (with contributions towards wider, strategic) highways mitigation measures;

(g) encouragement of sustainable transport measures, both through improvements to the existing walking and cycling networks in the locality and through new provision, which should also provide links with the adjoining area and the town centre (including, *inter alia*, an upgraded pedestrian and cycle way along Mangrove Road to Simon Balle School), and enhanced passenger transport services;

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

(i) public open space within the site, including the provision of a play area and opportunities for outdoor health and fitness activities, as well as space for wildlife;

(j) quality local green infrastructure through the site including opportunities for preserving and enhancing on-site assets, maximising opportunities to link into existing assets and enhance biodiversity. This should include, but not be limited to, the provision of a public amenity greenspace buffer (which will remain in the Green Belt) between the development and Hagsdell Stream to allow for the preservation of that part of the Hertford Green Finger. This shall include the existing treed area at the higher level, the tree belt at the lower level, and the sloped area of land between them leading towards Hagsdell Stream, and should also provide for public pedestrian access from Mangrove Road along with the protection of any public rights of way and other public access routes running through or on the boundaries of the site;

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

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

### **7.3 Employment in Hertford**

7.3.1 The county town of Hertford retains its traditional brewing role, albeit on a reduced basis from that of bygone times. The town has evolved its employment base over time to reflect changing needs and currently contains a broad spectrum of employment from industrial to prestige office accommodation with varying sized enterprises in its employment areas.

7.3.2 Hertford's location in relation to accessing the major road network means that it is an attractive place for businesses to locate; however, the A414 has a propensity towards congestion, especially at peak times, which can affect ease of access to some areas and will require mitigation in line with the

provisions of Hertfordshire County Council's emerging 2050 Transport Vision.

7.3.3 Hertford benefits from having the District's largest local authority employer, Hertfordshire County Council, located in the town. Other public and private sector employment premises also lie in close proximity to County Hall.

7.3.4 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 Hertford and to supplement this by the formal designation of the Pegs Lane area which has long been in employment use.

#### **Policy HERT6 Employment in Hertford**

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

(a) Caxton Hill;

(b) Foxholes Business Park;

(c) Hartham Lane;

(d) Mead Lane - East of Marshgate Drive (including the provisions of the Mead Lane Urban Development Framework);

(e) Mimram Road;

(f) Warehams Lane;

(g) Windsor Industrial Estate, Ware Road.

II. In addition, in accordance with Policy ED1 (Employment), the following location is designated as an Employment Area reserved primarily for B1 use:

(a) Pegs Lane.

## **7.4 Retail in Hertford**

7.4.1 Classed as a Secondary Town Centre, Hertford provides a wide range of comparison and convenience shopping in addition to other service needs. This offer serves both its own residents and those of surrounding settlements. Hertford's markets, food and drink facilities and successful night-time economy also draw patronage from wider locations.

7.4.2 However, its historic development pattern, while providing a unique character which acts as an attractor, also limits the potential of the town to expand its retail function in its central core.

7.4.3 Within some of its residential areas, Hertford also benefits from local parades and individual shops, which provide valuable resources for local people and passing trade, in addition to the retail offer in the town centre.

### **Hertford Town Centre Urban Design Strategy**

7.4.4 The Hertford Town Centre Urban Design Strategy was devised to guide future development in the town centre and to increase the viability and vitality of its commercial operations. It provides a long-term coherent vision for the area; proposes design approaches for key sites and areas within the town centre; and aims to guide developers by providing a framework for determining planning applications. The Strategy further seeks to engender a sense of community, to provide opportunities to reinforce or improve the sense of place associated with

Hertford Town Centre and its environs, in line with the sustainability principles outlined in section 2 of the NPPF (ensuring the vitality of town centres).

7.4.5 The Strategy, which is underpinned by robust technical evidence and two rounds of public consultation, has been agreed by East Herts Council, Hertfordshire County Council and Hertford Town Council, which will continue to work together to help bring its proposals to fruition. While provisions are included for improvements across Hertford's entire central core, of particular note is the Bircherley Green key site area, which is viewed as being the most important development opportunity site in the town centre. Key use and urban design principles for the mixed use redevelopment of this area, based around a revitalised retail offer, are included in the Strategy. Therefore, where any redevelopment proposals emerge for Bircherley Green, these should respond positively to the detailed provisions of the Strategy. It is intended that the Strategy will be adopted by East Herts Council as a Supplementary Planning Document in due course.

7.4.6 To ensure that the aims of the Hertford Town Centre Urban Design Strategy can be met, where development is proposed in town centre locations in Hertford, Policy HERT7 will apply.

**Policy HERT7 Hertford Town Centre Urban Design Strategy**

Development proposals in Hertford Town Centre will be expected to conform with, and positively contribute to, proposals contained within the Hertford Town Centre Urban Design Strategy, as appropriate.

**7.5 Leisure and Community Facilities in Hertford**

7.5.1 Hertford is located within an extremely attractive rural setting with unique areas of open land, known as 'Green Fingers',



which penetrate towards the centre of the town. While benefiting from these assets, Hertford's provision of public access, as well as the provision of space for children could be improved. Therefore, where possible, better public access to the countryside that surrounds the settlement should be created to support both existing and new communities in the town. Proposals for the development of the HERT3, HERT4 and HERT5 policy areas should therefore assist in this respect, through increased public access to countryside/green space provision. The river corridors have also been identified as areas where the improvement of both habitat and physical links connecting settlements should be sought, especially between Hertford and Ware and the wider countryside. Cycling provision is another area that would benefit from improvement. It is anticipated that the implementation of district-wide and settlement specific policies relating to development sites in and around Hertford, will result in increased access, as appropriate.

- 7.5.2 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 Policies CFLR1 (Open Space, Sport and Recreation) and contributions sought towards on or off-site provision, as appropriate.
- 7.5.3 Hertford's Green Fingers, which penetrate the town, are a recognised local amenity, wildlife and leisure asset and have been designated as Local Green Spaces under Policy CFLR2 (Local Green Space). This designation provides protection for these valuable resources and ensures that development will not be allowed in such locations, other than in very special circumstances.
- 7.5.4 All new development in Hertford will result in an increased demand for local services and community facilities including,

*inter alia*, healthcare and education. Development proposals should contribute to the enhancement of existing provision to ensure that both new and existing residents in the town are able to access community facilities and vital services within Hertford, 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), CFLR 9 (Health and Wellbeing) and CFLR10 (Education).

## EAST HERTS COUNCIL

### DISTRICT PLANNING EXECUTIVE PANEL – 8 SEPTEMBER 2016

#### REPORT BY LEADER OF THE COUNCIL

#### EAST HERTS DRAFT DISTRICT PLAN – THE GILSTON AREA – SETTLEMENT APPRAISAL AND NEW DRAFT CHAPTER 11

WARD(S) AFFECTED: ALL

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

The purpose of this report is:

- To present to Members a Settlement Appraisal for the Gilston Area, together with a proposed new chapter, for subsequent incorporation into the final draft District Plan and a first draft of the Concept Framework.

<b><u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:</b>	
<b>(A)</b>	<b>the Gilston Area Settlement Appraisal as detailed at Essential Reference Paper 'B' to this report, be agreed;</b>
<b>(B)</b>	<b>the draft revised Chapter 11 (The Gilston Area), 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; and</b>
<b>(C)</b>	<b>the Gilston Area Concept Framework, as detailed at Essential Reference 'D', be agreed as a first draft, with further work to take place in consultation with local communities, in order to prepare of final version prior to Submission of the District Plan in March 2017.</b>

## 1.0 Background

- 1.1 The Council published its Draft District Plan Preferred Options for consultation for a period of twelve weeks between 27<sup>th</sup> February and 22<sup>nd</sup> May 2014.
- 1.2 The issues raised through the consultation with regard to the Gilston Area Chapter were considered at the District Planning Executive Panel on the 21<sup>st</sup> July 2016.
- 1.3 This report presents a Settlement Appraisal for the Gilston Area. The 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 In addition, this report also presents a first draft of the Gilston Area Concept Framework. The purpose of the Framework is to support the allocation of the Gilston Area in the District Plan by providing further information on issues such as design principles, land uses, infrastructure and phasing. Further work will be undertaken on the draft Framework, in consultation with local communities, in order to finalise the document prior to Submission of the District Plan in March 2017.
- 1.5 **Essential Reference Paper 'B'** contains the Settlement Appraisal for the Gilston Area, **Essential Reference Paper 'C'** contains the revised draft chapter, while **Essential Reference Paper 'D'** contains the draft Gilston Area Concept Framework.

## 2.0 Report

- 2.1 The Preferred Options District Plan presented a draft development strategy which included the identification of the Gilston Area as a Broad Location for Development for the delivery of between 5,000 – 10,000 homes.
- 2.2 The Settlement Appraisal identifies that following further evidence gathering, it is the view of Officers that the Gilston Area should now be allocated within the Pre-Submission version of the Plan for 10,000 homes along with supporting infrastructure including roads, schools, health centres and public open space. Given anticipated build out rates, it is likely that approximately 3,000 dwellings will be provided in the Plan period, with the remainder being delivered after 2033. It should be noted that the Settlement

Appraisal refers to a technical document known as the 'Harlow Strategic Sites Assessment'. This document is currently in preparation, and while the draft findings have informed the Appraisal, a final version will be presented to this Panel on 15<sup>th</sup> September.

- 2.3 The draft revised chapter sets out what development in the Gilston Area will be expected to deliver. A draft Concept Framework has been prepared jointly by the landowners and the Council. The purpose of the document is to support the allocation of the Gilston through the District Plan and inform future, more detailed, design work and the planning application process. The Framework will be finalised, in consultation with local communities, prior to Submission of the District Plan.
- 3.0 Implications/Consultations
- 3.1 Information on any corporate issues and consultation associated with this report can be found within **Essential Reference Paper 'A'**.

### Background Papers

None

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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 revised chapter will form part of the Pre-Submission District Plan which will be consulted on in November 2016. The draft Concept Framework will be finalised in consultation with local communities.
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

### Gilston Area

#### 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, land to the north of Harlow, known as 'the Gilston Area' was identified as a preferred location for development. However, given the size and complexity of the site, and the need for the Council to gather further evidence regarding deliverability, the Gilston Area was not proposed for allocation at that stage. Instead, the Preferred Options District Plan identified it as a 'Broad Location for Development' for the delivery of between 5,000 and 10,000 new homes, both within this plan period and beyond, along with a range of supporting infrastructure such as new roads, primary and secondary schools, health centres and public open space.
- 1.3 Given the uncertainty of delivery at that time, and the need to undertake comprehensive masterplanning work, it was proposed that a separate Development Plan Document (DPD) be prepared following adoption of the District Plan in order to allocate the site. The DPD approach would set out the Council's intention to deliver development during the latter part of the Plan period, and would enable further consideration of site boundaries, Green Belt boundaries and infrastructure requirements. At that stage, the Preferred Options District Plan envisaged that the Gilston Area could provide approximately 3,000 new homes prior to the end of the Plan period, with the remainder coming forward beyond 2031 in order to help meet future housing needs.
- 1.4 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. The Settlement Appraisal should be read in conjunction with the Gilston Area Concept Framework which provides further detail on design principles, land uses, infrastructure and phasing.



Figure 1: Preferred Options District Plan, Gilston Area Key Diagram

## 2. Consultation Responses

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:

- that the Council had previously opposed development in this location through the now abolished East of England Regional Plan;
- development on Green Belt land;
- harm to the landscape;
- loss of agricultural land;
- impact on sites of environmental importance;
- capacity of services and facilities in the local area, particularly schools and health centres;
- capacity of the local and strategic road network, in particular around Harlow, Sawbridgeworth and Bishop's Stortford as well as the M11 and A414;
- impact on existing settlements including Eastwick, Gilston, High Wych, Sawbridgeworth, Hunsdon, Widford and the Hadhams;
- impact on heritage assets; and

- lack of joint working between the Council and neighbouring authorities, particularly Harlow Council.

2.2 In addition to the various concerns raised, a small number of positive comments were received, notably from residents who indicated support for a development strategy that reduces pressure on existing settlements in the District.

2.3 A full summary of the issues that were raised in respect of the Gilston Area 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/s34901/Chapter%2012%20Gilston%20-%20ERP%20B%20Issue%20Report.pdf>

### **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 held an informal meeting with a representative of the Planning Inspectorate 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 supply, these locations should become allocations in the District Plan if possible. Allocating these sites through the District Plan would provide greater certainty of delivery and assist with infrastructure planning.

3.3 Following the Preferred Options consultation, a number of technical studies have been prepared in order to inform ongoing work on the District Plan. These technical studies are discussed in Section 6 below. Following this work, it is now considered that there is sufficient evidence in place in order to identify the Gilston Area as an allocation within the Pre-Submission version of the District Plan, for the delivery of 10,000 homes, both within this Plan period and beyond.

3.4 Given the complexity and size of this site, it is recognised that further work is still required. The Advisory Team for Large Applications (ATLAS), which is part of the Homes and Communities Agency, has provided advice throughout the plan making process, particularly with regards to the deliverability of proposed strategic sites such as the Gilston Area. ATLAS

has suggested the preparation of a 'Concept Framework' document, prepared jointly by the Council and the site promoters. The rationale behind the Concept Framework approach, which has been successfully used elsewhere in the country, is to provide greater certainty prior to the Examination of the District Plan by identifying general development principles and potential land uses.

- 3.5 A first draft version of the Concept Framework has been prepared. The Council and site promoters will undertake further work, including with the relevant Parish Councils and local communities, in order to finalise the document prior to submission of the District Plan to the Planning Inspectorate in March 2017. In addition to helping demonstrate deliverability of the site at Examination, the Concept Framework will also shape the content of any future masterplanning work undertaken in relation to the Gilston Area.

#### **4 Developer Meetings / Information**

- 4.1 A number of meetings have been undertaken with the site promoters and other stakeholders following the Preferred Options consultation in order to discuss a range of issues. The minutes from these meetings are available to view on the Councils website: <http://www.eastherts.gov.uk/ga1>.

#### **5 Duty to Co-operate**

- 5.1 The Co-operation for Sustainable Development Member Board (Co-op Board) was set up in 2014, following the Preferred Options consultation on the District Plan. This group comprises the four core authorities that form the West Essex/East Herts housing market area (East Herts, Harlow, Uttlesford and Epping Forest), along with Hertfordshire and Essex County Councils and other local authorities in the wider area. The main function of the Co-op Board is to address strategic cross boundary issues within the wider Harlow area.
- 5.2 A number of joint working initiatives have been undertaken by the Co-op Board, including a Strategic Housing Market Assessment. Joint work has also taken place in relation to transport modelling and an assessment of strategic site options around Harlow. More information is provided on this work in the context of the Gilston Area in Sections 6 and 8 of this appraisal.
- 5.3 As part of discussions undertaken through the Co-op Board, it has been agreed that three Memoranda of Understanding (MOU's) will be prepared and signed. The MOU's require the relevant authorities to work collaboratively in order to:

- agree the distribution of development across the housing market area;
- identify and deliver strategic transport schemes in order to mitigate the impacts of development on the highway network; and
- mitigate and monitor the impacts of development on Epping Forest Special Area of Conservation (SAC).

5.4 The principle of development within the Gilston Area has also been considered through this forum. The development will be located within East Herts, and will make a significant contribution to the District's housing needs. However, there is a clear relationship between development in this location and Harlow, particularly with regards to transport and employment. Harlow Council is broadly supportive of development in the Gilston Area, largely because it has the potential to assist in the regeneration of the town by helping to re-balance the housing stock in the wider Harlow area.

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

## **6 Technical Assessments**

6.1 This section summarises the relevant technical studies that have been prepared following the Preferred Options consultation.

### **Green Belt Review 2015**

6.2 The Green Belt Review 2015 assessed various parcels of Green Belt to the north of Harlow, within the area identified by the Preferred Options District Plan as the Gilston Area Broad Location. All of the parcels in this area were concluded to have 'very low' suitability for development. The findings are discussed in more detail below, based on the four purposes of Green Belt that formed the assessment criteria within the study. The full Green Belt Review document can be viewed via the following link: <http://www.eastherts.gov.uk/greenbeltreview2015>.

6.3 Parcel 49, which covers a wide geographical area stretching from Stanstead Abbots & St. Margaret's to Eastwick, was assessed as being of 'moderate' importance with regards to checking unrestricted sprawl of large built up areas, in this case Harlow. In particular, it was noted that this area of Green Belt has prevented further development from 'leap-frogging' the floodplain of the River Stort. It was concluded that the parcel performs no role in terms of preventing neighbouring towns from merging into one another, or preserving

the setting and special character of historic towns. However, the study also concluded that Parcel 49 is of 'paramount' importance in terms of safeguarding the countryside from encroachment, and indeed that any development would represent a very apparent encroachment into open countryside where there are few features to provide containment.

6.4 Parcel 51 covers a smaller section of Green Belt between Eastwick and Gilston villages. Again, for the reasons noted above, this parcel was concluded to play a 'moderate' role in checking the unrestricted sprawl of large built up areas, a 'paramount' role in safeguarding the countryside from encroachment, and no role in preserving the setting and special character of historic towns. However, in contrast to Parcel 49, it was adjudged to perform a 'moderate' role in preventing neighbouring towns from merging into one another.

6.5 Parcel 52 lies further east, between the villages of Gilston and High Wych. When considered against the four purposes of Green Belt, the parcel was considered to perform the same important role as Parcel 49.

6.6 A fourth area of land, Parcel 53, was also assessed. This area lies partially within the Stort Valley floodplain, immediately to the north of Harlow. This area of land was adjudged to perform a 'major' role in checking the unrestricted sprawl of large built up areas, and a 'paramount' role in preventing neighbouring towns from merging into one another. This was largely on the basis that this Parcel of Green Belt, and in particular the eastern side of it, prevents the coalescence of Harlow and Sawbridgeworth. Again, it was concluded that the Parcel performs no role in preserving the setting and special character of historic towns.

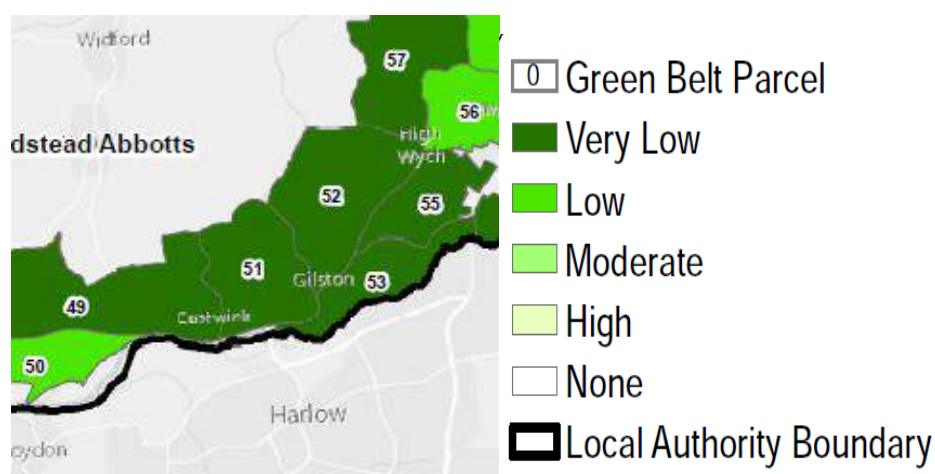


Figure 2: Conclusions of Green Belt Review 2015 for the area north of Harlow.

## Transport Modelling

- 6.7 The need to undertake further transport modelling was a significant factor with regards to identifying the Gilston Area as a Broad Location rather than an allocation within the Preferred Options District Plan.
- 6.8 Following the Preferred Options consultation in 2014, the Council has engaged closely with Essex County Council and our housing market area partners (Harlow, Epping Forest and Uttlesford Councils) through the Co-op Board in order to undertake strategic transport modelling. This modelling, known as VISUM, takes account of all planned growth proposed by the four local planning authorities. Transport modelling is an iterative process, and it is likely that the VISUM modelling will continue to evolve over the coming months as neighbouring authorities continue to prepare their respective local plans. However, modelling undertaken so far indicates that the strategic road network is able to cope with the provision of approximately 14,000 – 17,000 new homes in the wider Harlow area, providing that certain mitigation measures are implemented. This range of homes represents the amount of planned development that is likely to be provided within the Plan period up to 2033. It comprises an approximate figure of 3,000 homes within the Gilston Area, as well as development within Harlow itself, and on the edge of the town within Epping Forest District.
- 6.9 In order to deliver this level of growth within the Plan period, the following schemes will be required:
- Provision of a new Junction 7a on the M11;
  - Upgrade works to increase the capacity of Junctions 7 and 8 on the M11;
  - Widening of the existing River Stort road crossing;
  - Provision of a second River Stort road crossing; and
  - Upgrades to a number of existing junctions within Harlow.
- 6.10 In particular, the modelling demonstrates that early delivery of both a new Junction 7a and a second River Stort crossing will provide significant benefits in terms of increasing road capacity in the wider Harlow area. Creating capacity on existing roads through Harlow could facilitate the delivery of a 'multi-modal sustainable transport corridor' running from the Gilston Area, through Harlow town centre, to potential new development on the southern edge of the town, within Epping Forest District. The purpose of this corridor would be to make provision for sustainable forms of travel including buses, walking and cycling.



- 6.11 In order to provide in excess of 14,000 – 17,000 homes in the wider Harlow area, including a further 7,000 homes within the Gilston Area (beyond the initial 3,000 homes in the Plan period) , further strategic mitigation measures will be required. One possible solution is the provision of a ‘Harlow northern bypass’ running between the second River Stort crossing and Junction 7a. However, further transport modelling will be required in order to identify the full impacts of such a scheme, in particular the potential for higher volumes of traffic travelling westbound on the A414 towards the A10.
- 6.12 As noted in paragraph 5.3, it is intended that a Memorandum of Understanding be signed by the four core authorities of the Co-op Board, as well as Hertfordshire and Essex County Councils and Highways England. The MOU commits the authorities to working together in order to identify and deliver strategic highways schemes, including those identified within paragraph 6.9.

### **Delivery Study**

- 6.13 The Delivery Study is a technical document which assessed the financial viability and deliverability of the proposals contained within the Preferred Options District Plan. With regards to the Gilston Area, the study assessed the potential to bring forward a development of either 2,500 or 10,000 homes.
- 6.14 Having identified all known infrastructure requirements, and other costs arising from emerging District Plan policies and Building Regulations, it was concluded that a development of either size would be financially viable. In addition, the scheme for 2,500 homes was considered to be ‘developable’ in that there was a realistic prospect that development could commence within the Plan period. A larger scheme for 10,000 homes was considered ‘developable’ subject to securing solutions for sewage treatment and provision of a second River Stort crossing.
- 6.15 Following completion of the Delivery Study, the Council has continued to work with Thames Water regarding the capacity of Rye Meads Sewage Treatment Works. As a result of these discussions, Thames Water has advised that Rye Meads now has sufficient capacity to cater for all planned growth in the wider sub-region, within this Plan period and beyond. With regards to the second River Stort crossing, the site promoters are continuing to liaise with the relevant landowners in order to secure the land that is required to deliver the scheme. While no agreement has yet been reached, there is a realistic prospect that this can be achieved. While a scheme to the east of the existing crossing is considered to be the preferred option due to its proximity to the M11, the draft Concept Framework identifies that an



alternative scheme to the west of the existing crossing can be provided if necessary.

6.16 The Delivery Study also provided information with regards to likely build out rates for the strategic sites. For the Gilston Area, it was concluded that the likely completion rate would be 200 – 250 homes per year, based on having three to four sales outlets across the site at any particular point in time.

6.17 The Delivery Study is available to view on the Council's website: <http://www.eastherts.gov.uk/deliverystudy>

### **Harlow Strategic Sites Assessment**

6.18 As part of ongoing joint working, the Co-op Board has commissioned work in order to assess potential development options on the periphery of Harlow. This work has informed the consideration of site boundaries for the Gilston Area. More information is provided within Section 8 of this appraisal.

### **Gypsies and Travellers and Travelling Showpeople**

6.19 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.

6.20 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 course of the Plan period.

6.21 Given the strategic nature of the Gilston Area proposal, and the fact that it will provide development beyond the current Plan period, it is considered that it should provide for the longer term needs of the Gypsy and Traveller and Travelling Showperson community.

## **7 Deliverability Assessment, Land Uses and Infrastructure**

7.1 The majority of information relating to delivery, land uses and infrastructure is contained in the draft Concept Framework, referred to in Section 3. A full list of strategic infrastructure needed to support development in the Gilston

Area is contained in the Infrastructure Delivery Plan (IDP) that accompanies the District Plan.

- 7.2 Given the complexity of the site, it is unlikely that development will commence within the first five years of the Plan period (2017-2022). As identified in paragraph 6.16, the Delivery Study advised that a realistic build out rate for the Gilston Area would be the completion of 200 to 250 homes per year. Prior to the Preferred Options consultation on the District Plan, the Council asked the Advisory Team for Large Applications (ATLAS) to prepare a technical note on potential build out rates for strategic sites based on experience from other sites around the country. ATLAS advised that, for the Gilston Area, 300 to 500 completions per year could be possible, although the upper end of this range represented an optimistic scenario. The ATLAS technical note forms Appendix E to the Interim Development Strategy Report and can be viewed on the Council's website:  
<http://www.eastherts.gov.uk/strategyreport>
- 7.3 Based on the outcomes of the Delivery Study and the advice from ATLAS, it is the view of the Council that delivery of 300 homes per year is a realistic build out rate for the Gilston Area, with development likely to start in 2022/23. Development in the first two years is also likely to be less than 300 homes per year given the need to undertake significant on-site preparatory works. It is therefore expected that approximately 3,000 homes will be delivered within the Plan period up to 2033, with the remainder coming forward after that date.

## **8 Site Allocation Boundaries**

- 8.1 As identified by paragraph 1.1, the Supporting Document assessed a number of Areas of Search prior to the Preferred Options consultation. This work included an assessment of alternative options for strategic scale development or new settlements in other areas of the District. The principle of development within the Gilston Area was therefore established through that process.
- 8.2 In order to progress the Gilston Area from a Broad Location to an allocation, a site boundary and a revised Green Belt boundary need to be identified. As part of ongoing joint work, the Co-op Board commissioned consultants in order to assess the potential suitability of different site options around the periphery of Harlow. With regards to East Herts, the options were based on sites that were submitted to the Council through the 'Call for Sites' exercise which took place in the early stages of plan making. The assessment criteria included a number of different topic areas ranging from potential impacts on environmental and heritage assets to transport and access issues. The results of the assessment are presented in Figure 3.

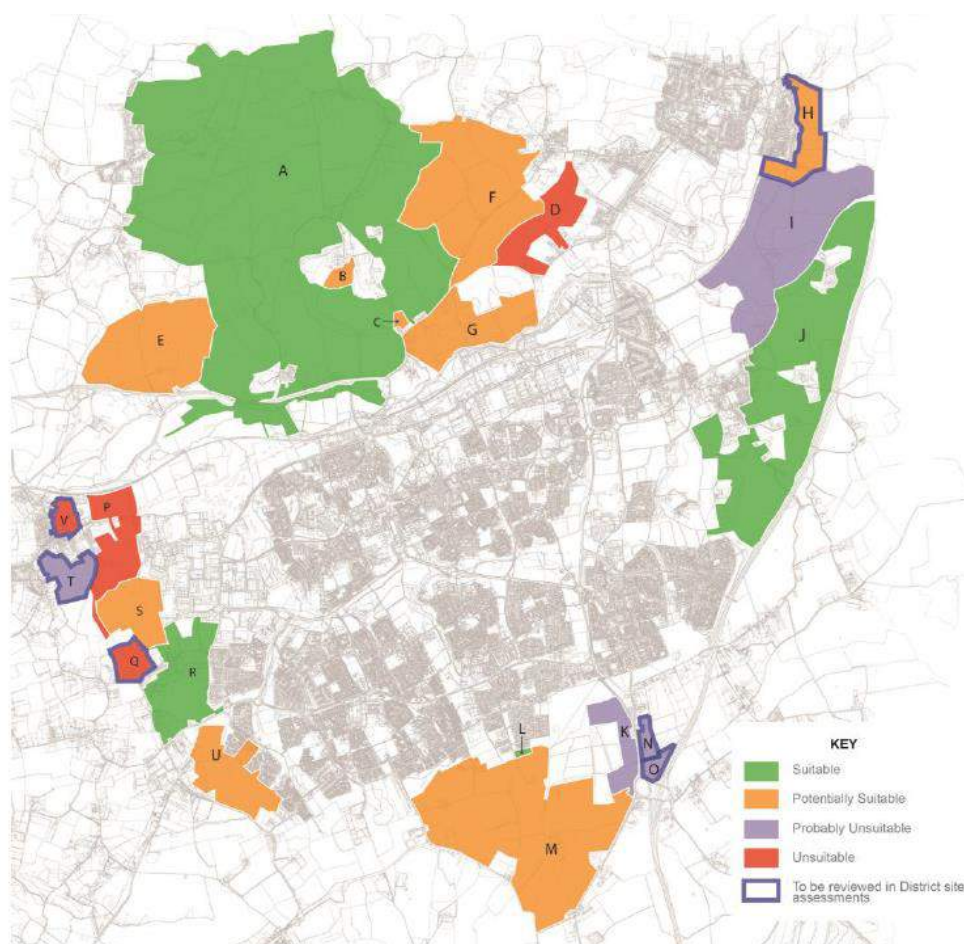


Figure 3: Harlow Strategic Sites Assessment: Conclusions

- 8.3 As illustrated above, Site A was concluded to be a 'suitable' site within the assessment. While it was noted that development in this location would have a significant impact on Green Belt, the ability to deliver a substantial amount of new development and supporting infrastructure weighed in its favour. In addition, the assessment indicated that development of Site A could make a significant contribution to the regeneration of Harlow.
- 8.4 Site B forms a small parcel of land, adjoining Site A. It incorporates Gilston Park, a locally important Historic Park or Garden. Given the size of the site, the assessment concluded that any impact on the Green Belt and wider landscape would not be significant. However, it was recognised that careful design would be required in order to maintain the setting of adjacent listed buildings. It was concluded that the site is 'potentially suitable' if viewed as part of a wider development in conjunction with Site A.
- 8.5 Site C is another small site that lies immediately adjacent to Gilston village. As with Site B, the assessment identified that development would not result

in a significant impact on the Green Belt or the wider landscape. The proximity of the site to listed buildings and a Scheduled Monument was noted although it was considered that any impacts could be mitigated. Again, it was concluded that the site is 'potentially suitable' if viewed as part of a wider development in conjunction with Site A.

- 8.6 Site D is a relatively large site that lies between High Wych Road and Redricks Lane. The assessment noted that development in this location would have a significant impact on the Green Belt, particularly in terms of the potential to cause coalescence between Harlow and High Wych. On this basis, the site was considered to be 'unsuitable' for development.
- 8.7 Site E, which is being promoted in conjunction with Site A, lies immediately to the north of the A414. It was recognised that the site lies within relative proximity to European designated sites within the Lee Valley Regional Park and that the potential to impact on these sites would need to be considered. In addition, it was noted that development would have a significant impact upon Green Belt. However, overall it was concluded that the site is 'potentially suitable' if viewed as part of a wider development in conjunction with Site A.
- 8.8 Site F is located between Site A and the village of High Wych. The assessment noted the potential for development to impact negatively on High Wych. In addition, there would be a significant impact on Green Belt and the wider landscape. The potential to contribute towards the regeneration of Harlow was noted. Overall, it was again concluded that the site is 'potentially suitable' if viewed as part of a wider development in conjunction with Site A.
- 8.9 The final site, Site G, is located immediately to the north of Harlow. The assessment notes that much of the site is located within Environment Agency Flood Zones, including the functional floodplain (Zone 3b). In addition, consideration would need to be given to the conservation of wetland habitats. However, it was concluded that the impact on the openness of the Green Belt would be limited, and that development would be well located in respect of employment opportunities. As with Sites B, C, E and F, it was concluded that the site is 'potentially suitable' if viewed as part of a wider development in conjunction with Site A.
- 8.10 The study provides a useful high level assessment of potential options around Harlow. Having considered these options in relation to the Gilston Area, it is the view of the Council that Sites A and E should be allocated for development. While recognising the significant impact that development in this location will have on the openness of the Green Belt and the wider landscape, these sites provide an opportunity to make a significant

contribution towards identified housing needs, both within this Plan period and beyond. It is recognised that the northern part of Site A is more sensitive in landscape terms than the rest of the site, given its higher elevation. It is therefore considered that this area should not be developed but should be used for the provision of substantial new public open space. This is reflected within the Harlow Strategic Sites Assessment, as shown in Figure 4 below. As is the case with Figure 3, the green areas are those that are considered to be 'suitable' for development, while the orange areas are those that are considered to be 'potentially suitable'.

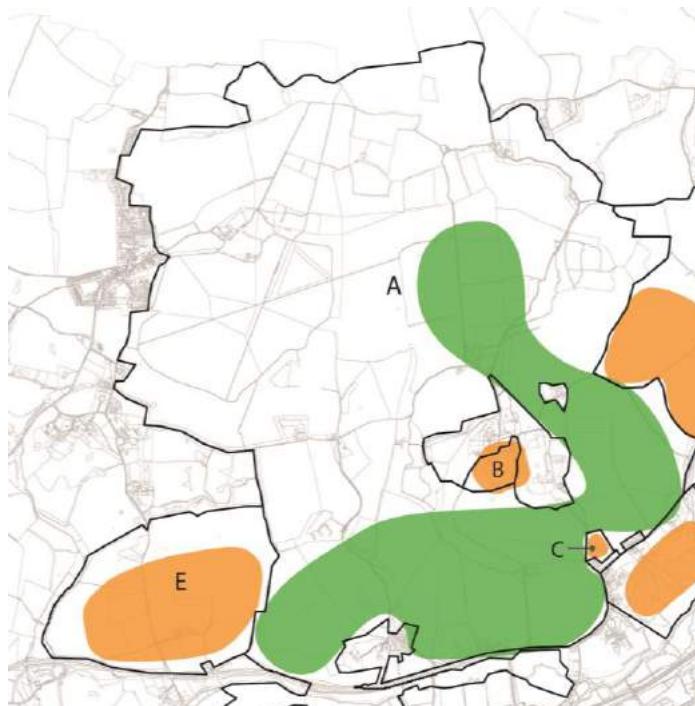


Figure 4: Harlow Strategic Sites Assessment.

- 8.11 In addition, while there are constraints associated with both Site A and E, including a number of heritage and environmental assets, it is considered that any impacts can be mitigated to a large extent through careful design and the use of appropriate landscape buffers. Development of this scale would also help facilitate the provision of strategic infrastructure schemes such as a Second Stort crossing. All of these issues are considered in more detail within the draft Concept Framework.
- 8.12 In relation to Site B, it is considered that development would have an unacceptable impact on the locally important Historic Park or Garden of Gilston Park, and as such should be avoided. While development of Site A would also impact on the character of this heritage asset, appropriate landscaping can help to mitigate this.



- 8.13 Similarly, it is considered that development of Site C would have an unacceptable impact on the character of Gilston village. Again, while development of Site A will also have an impact, the Concept Framework includes measures to ensure a landscape buffer is provided in order to maintain the integrity of Gilston village as a separate settlement. This is also the case with Eastwick village.
- 8.14 The Council agrees that Site D is unsuitable for development given that it would clearly lead to coalescence issues with both High Wych and Sawbridgeworth. In addition, while development of the western section of Site F would not directly lead to coalescence issues, it is considered important to maintain a significant Green Belt gap between the Gilston Area and High Wych and Sawbridgeworth. As such, Site F is also considered to be unsuitable.
- 8.15 Finally, while reasonably well related to the existing urban area of Harlow, Site G is considered to be unsuitable for development. Much of the site is within Flood Zones 2 and 3 which reduces the developable area to two small parcels of land. The two parcels are shown in Figure 5 below.



Figure 5: Harlow Strategic Sites Assessment.

- 8.16 Similar to Site C, it is considered that the western parcel would result in an unacceptable impact on the character of Gilston village. In addition, development of this site could fetter the ability to deliver a second road crossing of the River Stort. The eastern parcel would represent a slightly isolated pocket of development which would reduce the already narrow strategic gap between Harlow and the south western tip of Sawbridgeworth. Development in this location may also prevent the delivery of a Harlow Northern Bypass, should this be considered necessary following further

transport modelling work. Finally, much of Site G was previously used for quarrying, and subsequently, for landfilling. At present, the Council is investigating the extent of gas emissions associated with this use. It is therefore not possible to determine whether the site would be developable at this stage.

- 8.17 Having given consideration to alternative sites, the proposed site boundary is detailed in Figure 6 below.

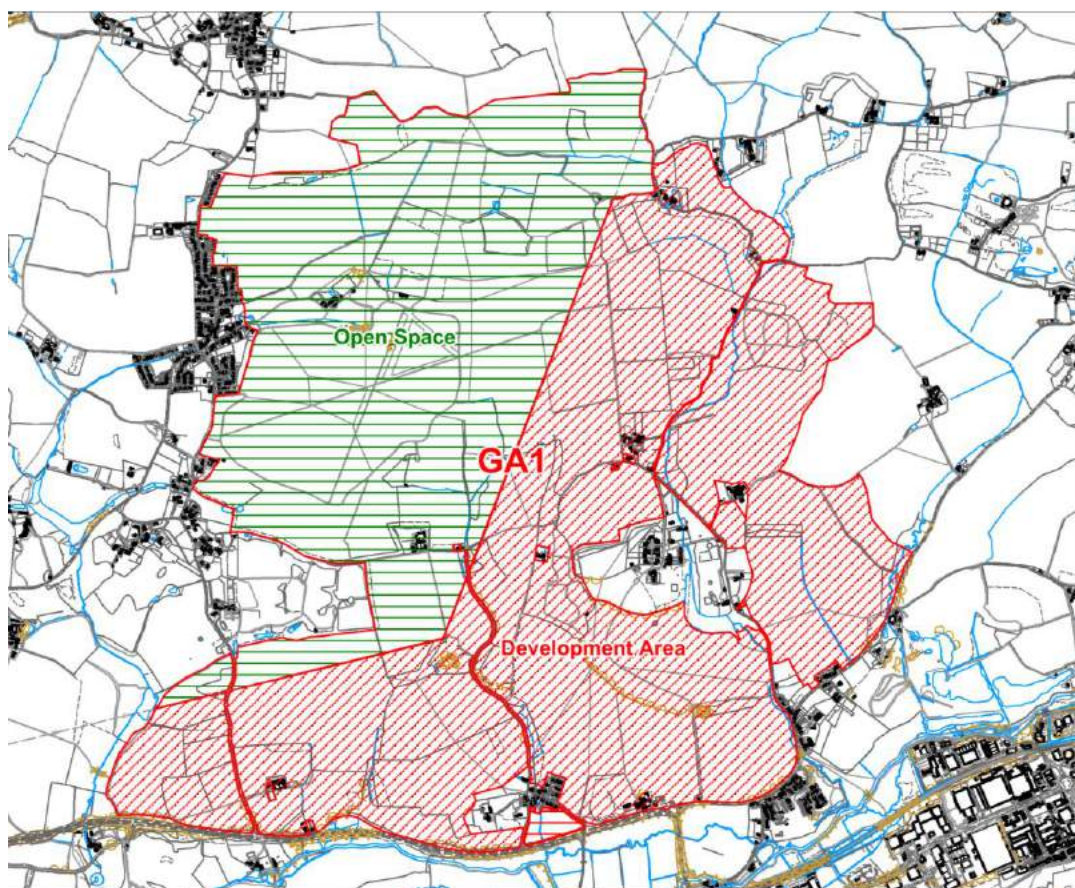


Figure 6: Site Allocation boundary

- 8.18 In responding to landscape form in the local area, it is considered that development should be limited to the area south and east of the electrical pylons. The northern section of the site, which is at a higher elevation, should remain undeveloped. As such it is proposed that significant new open space and parklands be provided. In line with Garden City principles, ownership and management of this land should be transferred to a community trust.

## 9. Green Belt Boundaries

- 9.1 Having established that Sites A and E should form the site allocation for the Gilston Area, consideration needs to be given to revised Green Belt boundaries. In general, the Council's approach through the District Plan is to



only release those areas from Green Belt that are directly required in order to deliver growth. With regards to the Gilston Area, the proposed approach to Green Belt is identified in Figure 6 below.

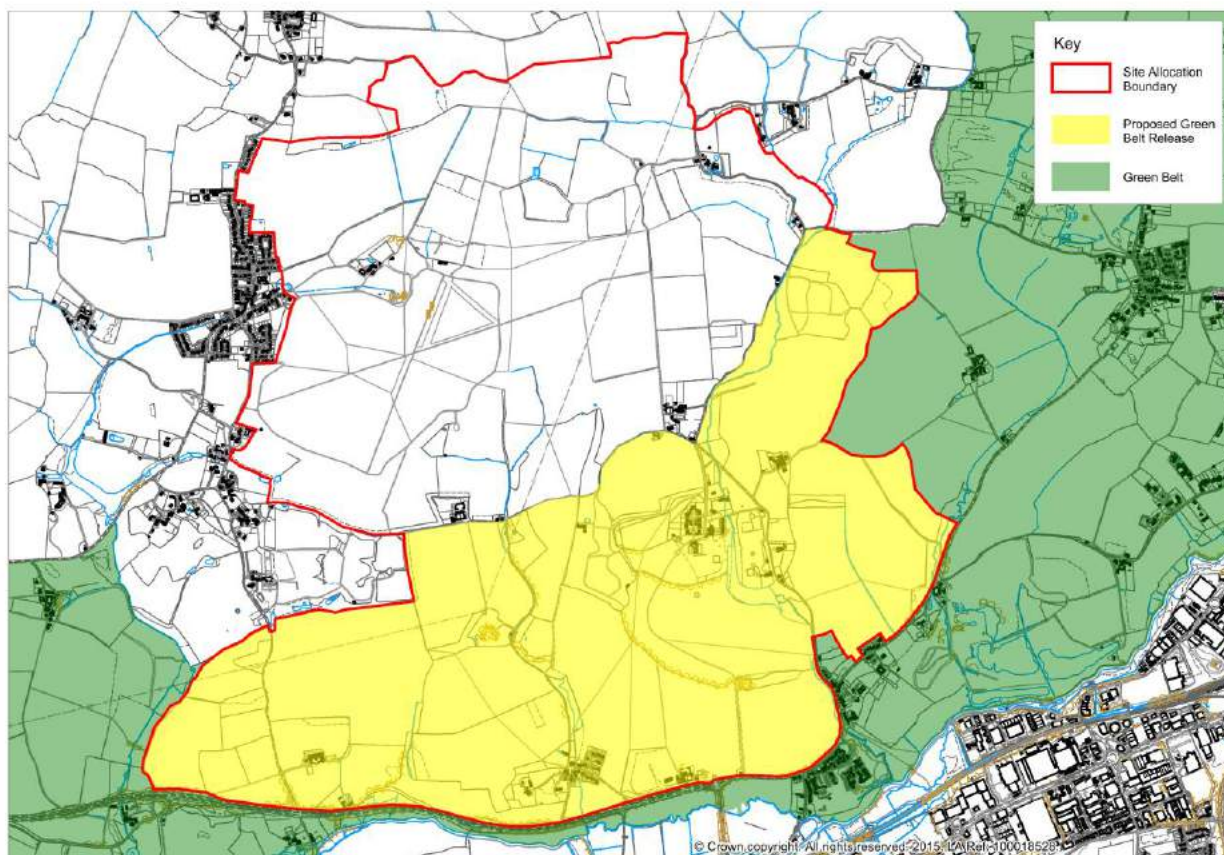


Figure 7: Proposed Green Belt release

9.2 Given anticipated build out rates, as identified in Section 6 of this Settlement Appraisal, it is expected that approximately 3,000 homes could be delivered in the Plan period, with the remainder coming forward after that date. However, paragraph 85 of the NPPF requires that local planning authorities 'satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period'. It is therefore necessary for the District Plan to remove the area of Green Belt required to deliver the full scheme of 10,000 homes, thereby ensuring that boundaries do not need to be reviewed again in this location within the next Plan period.

9.3 It is recognised that this approach leaves a narrow strip of Green Belt between Harlow and the Gilston Area (although Figure 6 does not show the extent of the Green Belt to the south of the River Stort, within the administrative area of Harlow). However, this situation is not unusual when considering the extent of the Metropolitan Green Belt as a whole. This approach does mean that the land required to deliver a widened existing Stort



crossing, and to deliver a second crossing to the east, remains within Green Belt. However, the Council considers that such works are considered to be compatible with paragraph 90 of the NPPF which allows for the provision of local transport infrastructure, where doing so would not harm the openness of the Green Belt.

- 9.4 The revised boundaries follow distinct features on the ground wherever possible, such as roads, treelines and field boundaries. The development will be expected to strengthen these boundaries through careful design and landscaping.
- 9.5 The Council is not proposing to introduce new Green Belt to the north of the Gilston Area. This is because 'Rural Area Beyond the Green Belt' policy, which covers those areas of the District that are not within Green Belt, seeks to achieve similar aims.

## **10 Neighbourhood Planning**

- 10.1 Hunsdon and Eastwick & Gilston Parish Councils had an Area Designation approved in September 2015 in order to undertake a joint Neighbourhood Plan. It is understood that the Plan remains in the early stages of preparation, subject to the finalisation of the District Plan.

## **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, below, of proposed development in the Gilston Area describes how the sites will meet the objectives as set out in the Sustainability Appraisal Framework.

### *Air Quality*

- 11.2 There are no Air Quality Management Areas (AQMA's) within the immediate vicinity of the Gilston Area. However, large scale development in this location, in conjunction with other development proposals, is likely to increase the amount of traffic using the A1184 through Sawbridgeworth and Bishop's Stortford where AQMA's are present. Air quality issues must therefore be monitored and managed in accordance with Policy EQ4 of the District Plan. A

Memorandum of Understanding (MOU) has been signed by the four core authorities of the Co-op Board, Hertfordshire and Essex County Councils, Natural England and the Conservators of Epping Forest. The MOU requires the development of a joint strategy in order to address potential adverse impacts on the integrity of Epping Forest Special Area of Conservation (SAC).

### *Biodiversity and Green Infrastructure*

11.3 While the Gilston Area contains a number of designated County Wildlife Sites, any impact can be mitigated to a significant degree through careful design and the use of landscape buffers. In addition, the Gilston Area will provide a significant amount of new green space in the form of parklands, which through careful management, has the potential to increase biodiversity across the site when compared to the current situation.

### *Community and Wellbeing*

11.4 The Gilston Area will deliver a significant amount of new housing, catering for all age ranges including an ageing population. The development 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 make valuable contributions to health and wellbeing objectives.

### *Economy and Employment*

11.5 The Gilston Area is located within close proximity to Harlow. While the development will provide local sources of employment, through the creation of education, retail, community and healthcare facilities on site, more significant opportunities will be easily and sustainably accessed within Harlow, including the new Enterprise Zone. The site also benefits from its proximity to Harlow Town railway station, from where other locations can be easily reached for employment purposes, including Bishop's Stortford, Cambridge and London.

### *Historic Environment*

11.6 There are a number of Areas of Archaeological Significance on site as well as Scheduled Monuments. There are also a number of listed buildings close by and a locally important Historic Park or Garden (Gilston Park). Any impact on these sites can largely be mitigated through the use of carefully designed

landscaped buffers. In particular, the approach to maintaining the setting of Gilston Park has been established through the draft Concept Framework.

### *Housing*

11.7 The proposal will cater for a significant proportion of the District's housing needs, both within this Plan period and beyond. It will provide for a wide range of house types and mix, including an appropriate quantum and mix of affordable housing and family sized homes. The development will also provide for the longer term needs of Gypsy and Travellers and Travelling Showpeople.

### *Land*

11.8 The Gilston Area is currently a large greenfield site that is largely in agricultural use (Grades 2 and 3). Development will be at appropriate densities in order to make efficient use of land while respecting the character of existing development. The northern section of the site will be utilised for open space and will therefore remain undeveloped, with the exception of a limited number of buildings associated with leisure and recreation uses. 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*

11.9 It is acknowledged that the Gilston Area will have a significant impact on the existing landscape. However, the draft Concept Framework identifies how the development will respond to the landscape by avoiding the most sensitive areas. In addition, as noted in paragraph 11.8, the northern section of the site, which is characterised by a more open landscape with far reaching views, will be utilised for open space.

### *Low Carbon Development*

11.10 The site will incorporate footpaths and cycleways and facilitate the provision of bus routes which will enable sustainable access to Harlow and other areas. In addition, the site will comprise buildings that incorporate sustainable building features. 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 will incorporate new cycle and pedestrian links as well as bus routes connecting to Harlow and the wider area. Development in this location also has the potential to help facilitate the delivery of a multi-modal sustainable transport corridor stretching from the Gilston Area, through Harlow, to a possible new development to the south of the town, within Epping Forest District. In order to facilitate the proposed level of development in the Gilston Area, strategic transport schemes will be required. These schemes are identified within Section 6 of this Settlement Appraisal.

### *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 to cater for planned growth beyond the Plan period.

## **12 Conclusion**

12.1 This Settlement Appraisal has sought to demonstrate that, given the evidence available, it is now appropriate to identify the Gilston Area as an allocation within the Pre-Submission version of the District Plan.

12.2 In particular, new evidence arising from the Delivery Study and ongoing transport modelling, has demonstrated that development in this location is deliverable, subject to the provision of required infrastructure including a new Junction 7a on the M11 and a second River Stort crossing. The site will therefore provide a significant proportion of the District's housing need, both within this Plan period and beyond. Allocation of the site for 10,000 homes, with approximately 3,000 to be delivered within the Plan period, will help to ensure that Green Belt boundaries will not need to be reviewed again at the end of the Plan period, in conformity with the requirements of the NPPF. In addition, the provision of approximately 7,000 homes beyond 2033 will reduce future pressure to provide for new homes on the periphery of existing settlements in the District.

12.3 The site will provide significant services and facilities including schools, libraries, community centres and health centres. A substantial amount of new public open space will also be delivered for the benefit of new and existing residents.

12.4 A draft Concept Framework has been prepared which identifies general development principles and potential land uses. The Framework will be

refined prior to submission of the District Plan in March 2017, in consultation with local communities including Parish Councils.

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## Chapter 11 The Gilston Area

### 11.1 Introduction

- 11.1.1 The Gilston Area is located to the north of the Stort Valley, in close proximity to the New Town of Harlow. It is characterised by an area of undulating countryside with a number of features including small streams, woods, hedgerows, and the historically important Gilston Park. A number of small settlements are located adjacent to the Gilston Area, including the villages of Hunsdon, Eastwick and Gilston.
- 11.1.2 Development in this location provides a unique opportunity to deliver a strategic sized sustainable development that will provide for a significant proportion of the District's housing needs, both within this Plan period and beyond. As such, the Gilston Area is allocated for a total of 10,000 new homes, with approximately 3,000 homes to be delivered in the Plan period, along with a significant amount of supporting infrastructure including roads and sustainable transport provision, schools, health centres and public open space. Providing a significant amount of development beyond 2033 will help to ensure that Green Belt boundaries will not need to be reviewed again in this location, and will also reduce pressure to provide development in and around existing settlements in the next Plan period.
- 11.1.3 Given its proximity to Harlow and its railway stations, residents of the Gilston Area will have access to substantial employment opportunities both within the town itself, and further afield. As well as providing benefits to East Herts, the development will support the regeneration of Harlow by helping to draw investment to the town and enhance its economic performance.
- 11.1.4 A Concept Framework is being prepared jointly by the landowners and the Council, in consultation with local communities, which will identify design principles, land uses, infrastructure requirements and phasing.

## 11.2 Development in the Gilston Area

11.2.1 The main components of the development strategy for the Gilston Area are as follows:

11.2.2 **Housing:** development in this location will provide a mixture of house sizes and tenures across seven distinct villages, including affordable housing and homes for older people. Provision will also be made for Gypsy and Travellers and Travelling Showpeople.

11.2.3 **Education:** the site will deliver two new secondary schools and five primary schools in order to fully cater for the needs arising from the development. Early Years Education will also be provided for.

11.2.4 **Transport:** a wide range of small and large scale interventions including sustainable transport measures, will be required if development in the wider Harlow area, including the Gilston Area, is able to proceed without causing unacceptable congestion in Harlow and the surrounding towns and villages, as well as the wider strategic transport network. These interventions include a new Junction 7a on the M11, upgrades to Junctions 7 & 8, a second River Stort crossing, and widening of the existing crossing. Sustainable transport measures will also be required including new bus services, connecting to Harlow and the wider area, as well as provision for walking and cycling.

11.2.5 **Community Facilities:** the Gilston Area will provide new community facilities based around a network of village centres. The facilities will include community meeting spaces, libraries and sport and recreation facilities. A range of local shops will also be provided, along with two healthcare centres which will accommodate both family doctors and other health services such as dentists, pharmacies, physiotherapy and outpatient services. Consideration will also be given to the potential of the site to facilitate the re-location of the Princess Alexandra Hospital.



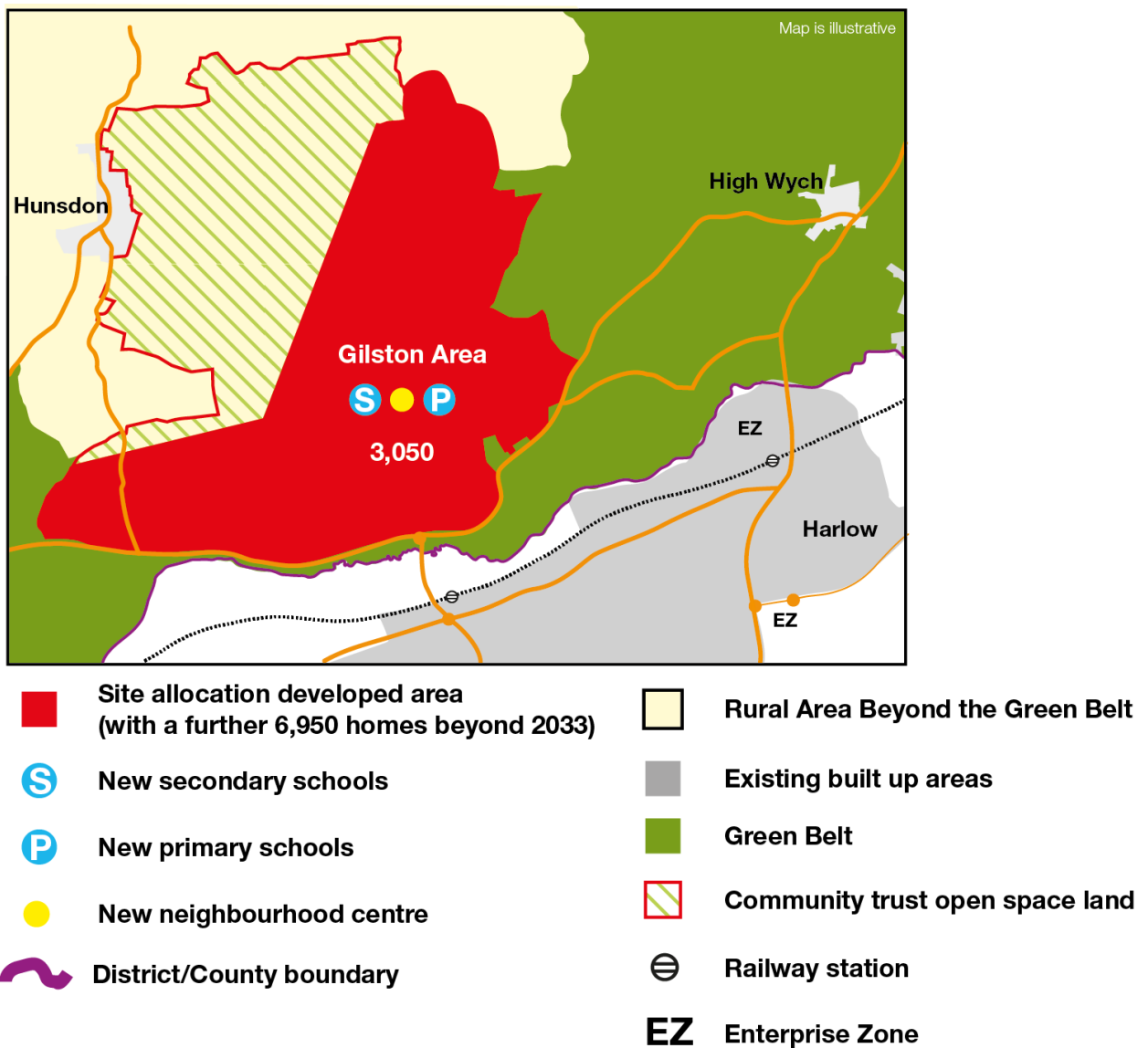
- 11.2.6 **Employment:** the development will provide local employment, including small scale office space. Residents will also be able to access more substantial employment opportunities within Harlow, including the Enterprise Zone. The proximity of the site to Harlow Town station will also enable sustainable access to employment opportunities further afield, including Cambridge, Bishop's Stortford and London.
- 11.2.7 **Open Space:** The site allocation covers a large geographical area. However, only the south and south eastern sections of the site will be developed. In addition to development, this part of the site will deliver new green spaces including sports pitches, parks and recreation areas. Within the north and north western sections of the site, a substantial amount of public open space in the form of managed parklands will be provided. This area will therefore remain undeveloped, with the exception of a small number of buildings associated with its recreational use. A community land trust, or other governance mechanism as appropriate, will be established in order to deliver local ownership and management of these assets. This should take place in an overall development programme. In addition, the environment of the Stort Valley will be enhanced through the provision of new green infrastructure links.
- 11.2.8 **Character:** The development will be of high quality design, with careful consideration given to layout, architecture, building heights and materials. It will also be sensitively integrated visually in the wider context of the surrounding landscape. Landscape buffers will be provided in order to maintain the distinct identities of Eastwick and Gilston villages within the context of the overall development.
- 11.2.9 **Heritage:** The site contains a number of heritage assets, including listed buildings and Scheduled Monuments. Gilston Park, a locally important historic asset, is also located within the Gilston Area, although it does not form part of the site allocation. The development will be designed in order to ensure

that these assets are retained, and their setting protected within the context of the overall development.

11.2.10 **Ecology and Environment:** The development will retain and protect important hedgerows, County Wildlife sites and ancient woodlands. New habitats will be created in order to achieve an overall net gain in biodiversity. A Sustainable Drainage (SuD's) network will be integrated to provide additional planting and biodiversity and to facilitate drainage and water retention.

11.2.11 The main features of the policy approach to development in the Gilston Area are shown on Figure 11.1 below:

Figure 11.1 Key Diagram for Land in the Gilston Area



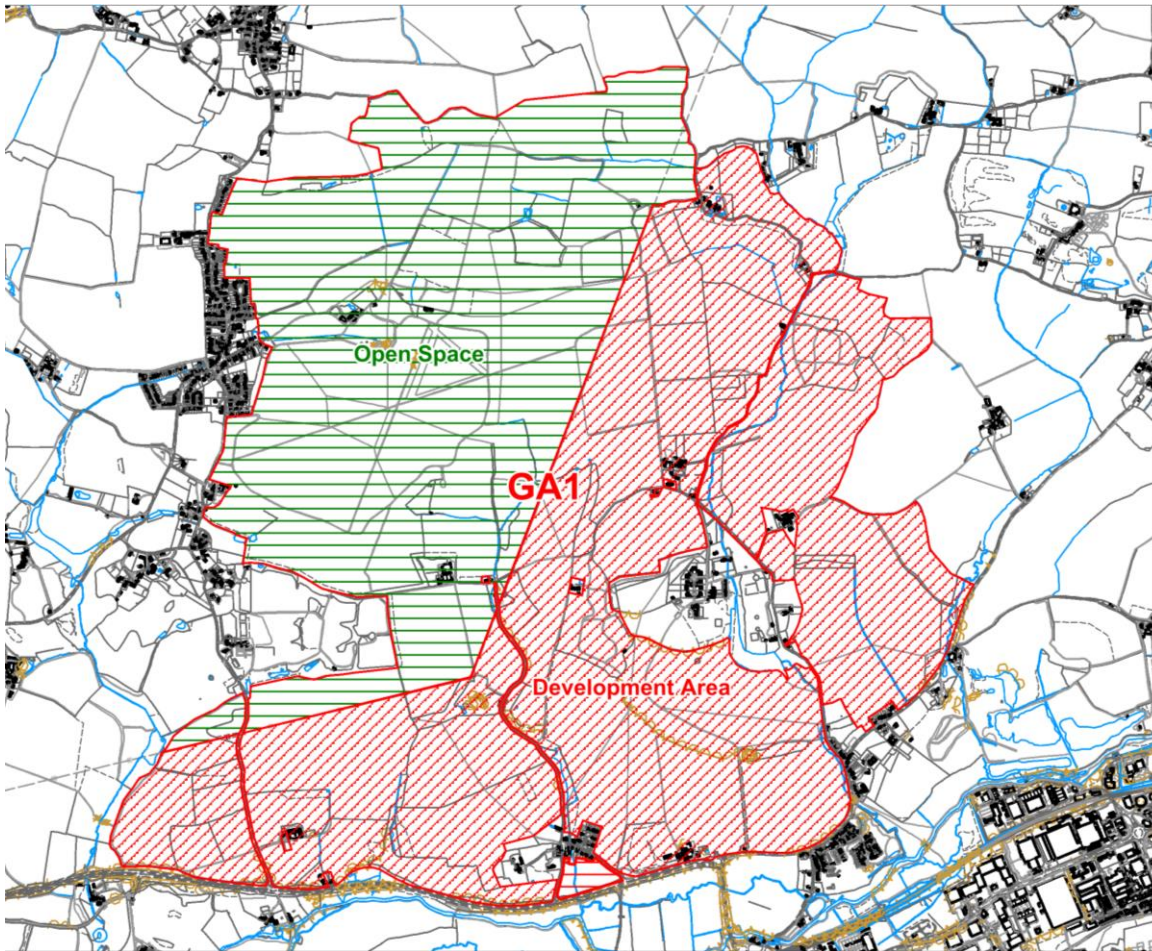


Figure 11.2 Site Location Plan.

### **Policy GA1 The Gilston Area**

I. In accordance with Policy DPS3 (Housing Supply 2011-2033), land at the Gilston Area is allocated for development to accommodate 10,000 homes. It is anticipated that approximately 3,000 homes could be delivered within the Plan period, with the remaining 7,000 being delivered after 2033.

II. A Concept Framework will be jointly prepared by the landowners and the Council, in consultation with local communities, which will identify design principles, potential land uses, infrastructure requirements and phasing. Prior to the submission of any planning application(s) further detailed design work will be required in order to agree, among other

things, the quantum and distribution of land uses, access and layout principles.

III. 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) a care home/ flexi-care or sheltered properties in accordance with the provisions of Policy HOU6 (Homes for Older and Vulnerable People);
- (d) Self Build Housing in accordance with Policy HOU8 (Self Build Housing);
- (e) provision of a serviced site for Gypsy and Travellers, in accordance with Policy HOU9 (Gypsies and Travellers and Travelling Showpeople) which should deliver 15 pitches for longer term needs beyond the Plan period;
- (f) provision of a serviced site for Travelling Showpeople in accordance with Policy HOU9 (Gypsies and Travellers and Travelling Showpeople) which should deliver 8 plots for longer term needs beyond the Plan period; (each of sufficient size to allow for the provision of accommodation and equipment plus storage/maintenance);
- (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 the protection of County Wildlife Sites and other assets of environmental value;
- h) significant managed public open space and parklands, and a limited number of buildings associated with that use, on the northern section

of the site as identified in Figure 11.2, the ownership of which will be transferred to a community trust or other mechanism that ensures long term governance;

- (i) a variety of public green spaces across the site, including the provision of play areas and opportunities for outdoor health and fitness activities, as well as space for wildlife;
- (j) access arrangements and local highways measures and commensurate financial contributions to addressing impacts on the wider strategic highways network, including a new Junction 7a on the M11;
- (k) education facilities, including Early Years facilities, 15fe of primary school provision and 14fe of secondary school provision;
- (l) sustainable transport measures which encourage walking and cycling including:
  - the provision of cycleways and footways that provide links throughout the site and into Harlow;
  - enhancement of existing bridleways and footpaths;
  - enhanced passenger transport services including the creation of a sustainable transport route through the site which will link into a sustainable transport corridor which links the Gilston Area to possible development to the south of the town, within Epping Forest District, via the town centre;
- (m) consideration of the potential of the site to facilitate the delivery of a re-located Princess Alexandra Hospital;
- (n) the use of appropriate landscape buffers in order to protect the individual character and integrity of Eastwick and Gilston villages within the context of the development;
- (o) protection and enhancement of heritage assets and their settings, both on-site and in the wider area through appropriate mitigation measures;

(p) neighbourhood centres in accessible locations, providing local retail and community uses, including healthcare facilities to meet the day-to-day retail and health needs of new residents;

(q) small scale office space to meet local needs;

(r) indoor and outdoor sports facilities (which may be shared use) to include junior football and mini soccer pitches;

(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) necessary new utilities, including integrated communications infrastructure to facilitate home working;

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

(x) sustainable drainage and provision for flood mitigation;

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

IV. 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 aims of the Concept Framework, and any other more detailed design work, and will not prejudice the implementation of the site as a whole.

## **11.3 The River Stort Crossings**

- 11.3.1 The greater Harlow area is forecast to experience significant housing and employment growth during the plan period. The A414 corridor is already under pressure. Potential improvements are being explored along the wider corridor, and a new junction on the M11 is being promoted by Essex County Council (Junction 7a). In order to provide capacity to meet the wider needs of the existing residents and businesses, and future growth, the connectivity over the River Stort needs to be improved. Schemes have previously been designed for improvements to the existing A414 crossing at Eastwick.
- 11.3.2 Additional crossing options are also being reviewed, both to the east and the west of the existing crossing. New crossings both to the east and west are feasible, but deliver different benefits. The eastern crossing is the option preferred by Essex County Council, largely because of the way in which it enhances access to the Enterprise Zone and links through, potentially, to the proposed new motorway Junction 7a. Any application proposals will need to address environmental factors such as visual impact, ecology and flooding.
- 11.3.3 In accordance with paragraph 90 of the NPPF the Council considers it appropriate for the crossings to be located across Green Belt land. The Council, Harlow Council, Hertfordshire County Council and Essex County Council are exploring the land ownership associated with delivering additional transport capacity and, if necessary, are able to use CPO powers to bring forward works needed to support the growth and regeneration of the area.
- 11.3.4 Widening of the existing River Stort Crossing will help facilitate the provision of a sustainable transport corridor which will connect the Gilston Area with potential new development to the south of Harlow in Epping Forest District, via the town centre.

## **Policy GA2 The River Stort Crossings**

The Council will work with key stakeholders including Hertfordshire County Council, Essex County Council, Harlow Council, Hertfordshire LEP, and others as appropriate, to facilitate the delivery of the following transport improvements to crossings of the River Stort:

- A widening of the existing A414 crossing to enable a dualling of the northbound and southbound carriageways and provision of a new footway/cycleway, which will form part of a north-south sustainable transport corridor through Harlow; and
- A new vehicular, cycle and pedestrian crossing either to the east of the existing crossing (connecting the A414 to the River Way), or to the west of the existing crossing (connecting the A414 to Elizabeth Way).



## EAST HERTS COUNCIL

### DISTRICT PLANNING EXECUTIVE PANEL – 8 SEPTEMBER 2016

#### REPORT BY LEADER OF THE COUNCIL

#### EAST HERTS DRAFT DISTRICT PLAN – EAST OF STEVENAGE – SETTLEMENT APPRAISAL AND NEW DRAFT CHAPTER 12

WARD(S) AFFECTED: ALL

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

The purpose of this report is:

- To present to Members a Settlement Appraisal for East of Stevenage, together with a proposed new chapter, for subsequent incorporation into the final draft District Plan.

<b><u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:</b>	
<b>(A)</b>	<b>the East of Stevenage Settlement Appraisal as detailed at Essential Reference Paper 'B' to this report, be agreed; and</b>
<b>(B)</b>	<b>the draft revised Chapter 12 (East of Stevenage), 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.</b>

#### 1.0 Background

1.1 The Council published its Draft District Plan Preferred Options for consultation for a period of twelve weeks between 27<sup>th</sup> February and 22<sup>nd</sup> May 2014.

1.2 This report presents a Settlement Appraisal for East of Stevenage. The Settlement Appraisal provides the Council's justification for the proposed chapter having regard to the issues

raised during the Preferred Options consultation, further technical and delivery assessment and sustainability appraisal.

1.3 **Essential Reference Paper ‘B’** contains the Settlement Appraisal for East of Stevenage and **Essential Reference Paper ‘C’** contains the proposed chapter.

## 2.0 Report

2.1 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 area to the east of Stevenage would not in itself suggest that the land would be suitable for Green Belt release. However, it should be noted that the Green Belt 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.

2.2 On balance it is considered that, in order to allow for an urban extension to the sustainable settlement of Stevenage, it would be appropriate to allow some Green Belt release in this instance in order to meet identified housing need.

2.3 Consequently, land to the East of Stevenage at Gresley Park is allocated for development in the East Herts District Plan to accommodate 600 new homes within the first five years of the Plan.

2.4 The site will provide a variety of new homes in an established travel to work corridor, will provide new employment opportunities and will make provision for Travelling Showpeople. The site will provide a number of benefits to both the new and existing community, namely through the provision of a new school and other community facilities. The site will also contribute towards the improvement of infrastructure which is necessary to support the wider growth within the town, namely the reinstatement of Barnwell East Secondary School and improvements to the A602/Gresley Way junction. The primary school and early-years facility will be in the centre of the development alongside

community facilities, serving to create a focal point for the new community. The new school and healthcare facilities will also serve the wider population.

2.5 The draft revised chapter sets out what the development will be expected to achieve including an illustrative conceptual 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 <sup>th</sup> February and 22 <sup>nd</sup> 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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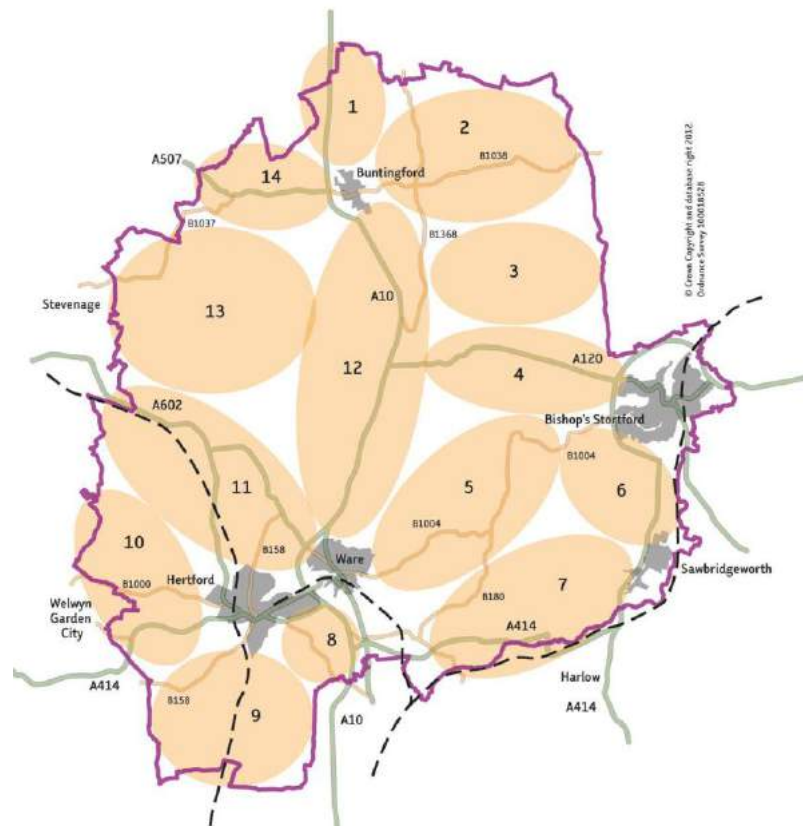
## Settlement Appraisal

### East of Stevenage

#### 1. History

- 1.1 The Preferred Options District Plan did not include any development on land to the east of Stevenage. The [Supporting Document](#) of the Preferred Options District Plan records the various assessment stages that were undertaken to inform the Preferred Options 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 or ‘Areas of Search’.
- 1.2 The first stage of the option sieving process comprised a theoretical appraisal of areas of search rather than an assessment of specific sites. As shown in Figure 1 below, the district was divided into areas shown as ellipses to avoid the false impression of precision. At this initial shortlisting stage, the appraisal considered whether a new settlement of approximately 5,000 new homes could be accommodated in the wider area to the east of Stevenage (Area of Search 13), considering issues such as transport infrastructure, connectivity and coalescence.

**Figure 1: Areas of Search for New Settlements**

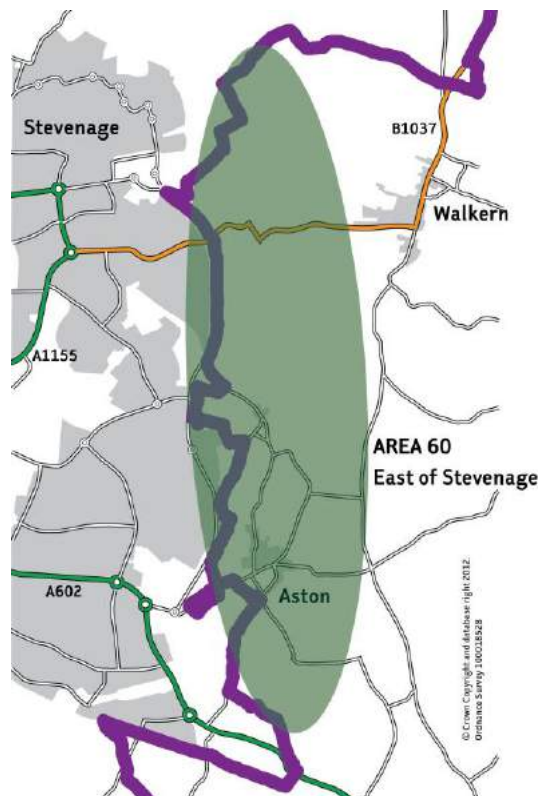


- 1.3 Area of Search 13 scored poorly in terms of transport infrastructure because the area had neither rail nor primary route potential and was therefore given a ‘red’ rating against this criterion. The area was given an ‘amber’ rating under the

settlement network criteria as it would be considered a satellite settlement to the town of Stevenage. A new settlement in this location was not considered to cause coalescence between towns and was therefore given a 'green' rating. It was concluded that Area of Search 13 was not a suitable location for a standalone new settlement as it was not considered possible to deliver the necessary scale of transport infrastructure required to support a new settlement in this location.

- 1.4 Whilst the potential for a new settlement was discounted, further work was then undertaken to consider the appropriateness of a strategic urban extension of around 5,000 homes. The area of land under consideration at the time is shown in Figure 2 below (Area of Search 60).

**Figure 2: Area of Search 60 – Land East of Stevenage**



- 1.5 A two stage sieving approach was undertaken. The first sieving stage was a factual assessment of 69 areas of search across the District against 21 different topic areas, drawing on input from stakeholders and evidence that was available at the time. Section 4.10.2 of the [Supporting Document](#) contains the evaluation of Area of Search 60. Based on the first sieving stage, Area of Search 60 was considered a 'marginal fail'. It was concluded that a strategic urban extension would require significant infrastructure in terms of employment, education, highways and waste water infrastructure and would be of a scale that would harm the Beane Valley. A smaller scale of development was also considered to fail this round of assessment because it would not be able to support the infrastructure requirements, given its unknown size, location and ability, thus making development too uncertain to warrant further consideration. The potential benefits associated with development were not considered sufficient to outweigh the uncertainty. This first sieving stage indicated that further consideration would need



to be given to whether strategic employment or housing need would provide the 'exceptional circumstances' necessary for a Green Belt Review in this location.

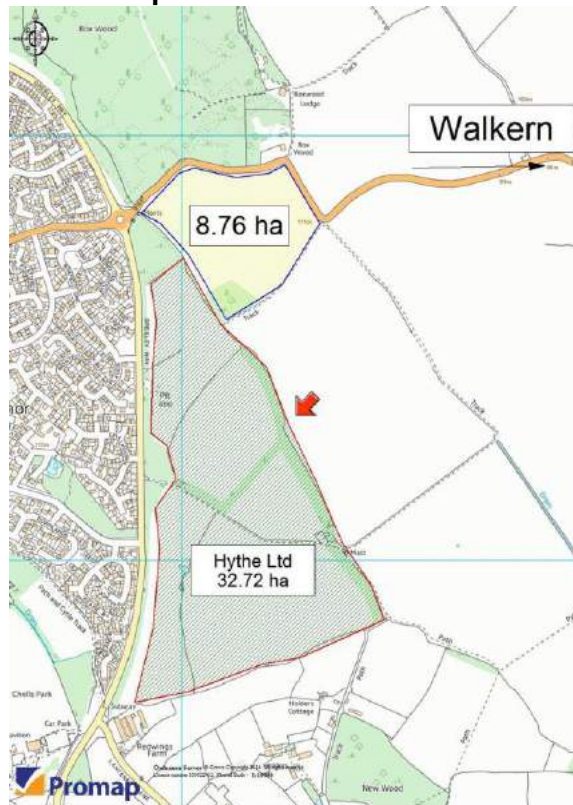
- 1.6 The second stage of the sieving process considered the potential impacts of development on the settlement or the locality. This stage drew together a number of considerations including links to the economic geography of an area, the capacity of town centres, travel to work patterns as well as physical or environmental constraints. Section 4.10.3 of the [Supporting Document](#) explains this second sieve in more detail. The sieving process at the time acknowledged that if it was determined that the East Herts housing and economic needs could be provided in other locations, there would be no need to develop to the east of Stevenage.
- 1.7 Following this second sieving stage, strategic development to the east of Stevenage was discounted for the following reasons:
- A strategic urban extension to the east of the town would require considerable supporting infrastructure which would be deemed unattractive to employers and investors, not able to compete with or complement the existing retail offer or too costly in terms of the provision of road networks.
  - The scale of development would require a large land take that would be detrimental to the Beane Valley, a wide valley containing rare and valuable chalk stream environments.
  - Alternative locations within East Herts were available and would meet the needs determined at that time. Alternative sites were also available and sequentially preferable around the north and west of Stevenage as established by the Stevenage and North Herts Area Action Plan which could meet development needs within the sub-regional context. Therefore land to the east of the town was not needed to accommodate the needs of Stevenage or East Herts.
- 1.8 Consequently the land to the east of Stevenage was not included in the East Herts Preferred Options District Plan published for consultation in 2014.

## **2. Consultation Responses**

- 2.1 Comments were received to the 2014 Preferred Options Consultation that suggested that land to the east of the town could be suitable for a smaller scale of development than was previously considered. Stevenage Borough Council suggested that the evidence used looked only at broad areas and therefore may have "missed the opportunity to properly consider more discrete opportunities for smaller-scale development and incorrectly reached the conclusion that east of Stevenage is an inappropriate location for development." Stevenage Borough Council also considered that "a relatively small-scale scheme to the east of Stevenage ~ of perhaps between 500 and 1,000 homes ~ could make a positive contribution to medium-term development requirements, introduce greater flexibility and certainty to the East Herts strategy and provide sustainability advantages over a number of the sites that have been identified."

- 2.2 Keymer Cavendish, the agent representing Hythe Ltd (landowner) made representations which included a large swathe of land which wraps around the eastern and north-eastern edge of Stevenage. However, part of the representation focused on the smaller triangle of land directly adjacent to Gresley Way, north of Aston village – as shown in Figure 3 below.

**Figure 3: Hythe Ltd representation to the 2014 Preferred Options District Plan consultation**



- 2.3 The representation cited housing need and delivery issues with the proposed Broad Locations that could result in the Plan being found unsound. Therefore smaller sites which could be delivered quickly without such infrastructure constraints should be considered more favourably, such as their new smaller site. The representation referred to the Stevenage Landscape Sensitivity Study (2006), which suggested that minor adverse impacts on the Beane Valley would remain until structural landscape planting that was undertaken in 1995/96 was established. This planting has had 20 years to establish and has achieved the objective of shielding the site from the Beane Valley. The representation outlines the site's suitability for a number of reasons including affordability compared to other locations.

### **3. The Emerging Strategy**

- 3.1 A key element of plan-making is the consideration of all reasonable alternatives to the development strategy. Therefore it was considered sensible to assess the newly submitted site in the same way that other sites had been assessed. As such further work was undertaken on the Green Belt and transport modelling, with

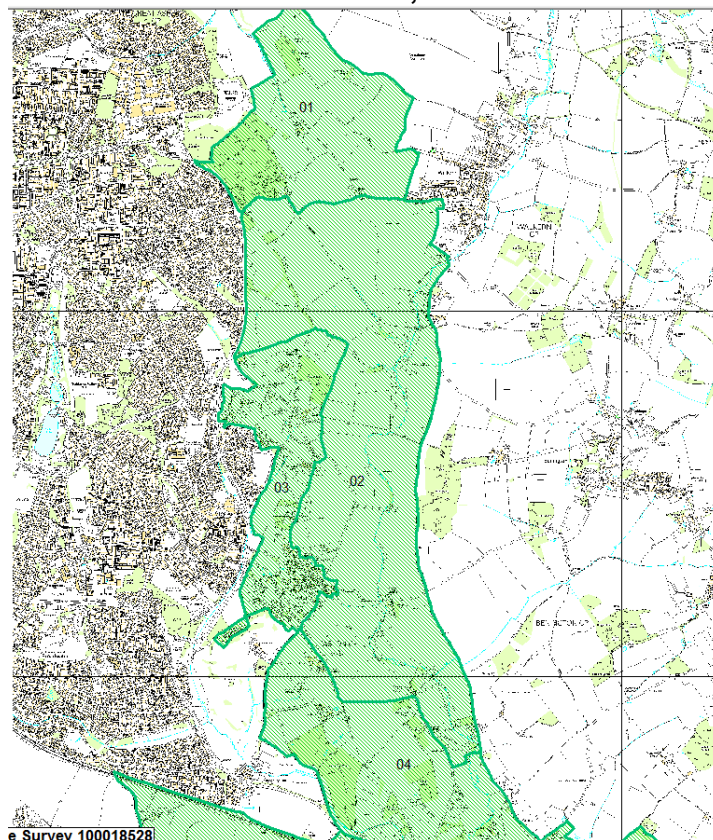
further consideration given to the potential impact of a smaller scheme on the landscape.

#### 4. Technical Assessments

##### East Herts Green Belt Review 2015 (Peter Brett Associates)

- 4.1 The 2015 East Herts Green Belt Review assessed the District's Green Belt against the purposes of including land within the Green Belt. Land to the east of Stevenage was divided into 4 separate parcels based on the Landscape Character Assessment parcels and using readily recognisable features on the ground. Parcels 1 to 4 cover the land to the east of the town, with the northern part of Parcel 2 adjoining Gresley Way and Parcel 3 covering Aston and Aston End. The Review notes that the current inner Green Belt boundary is well defined, with a well contained urban edge. The parcel has a paramount contribution to the roles of Green Belt in checking the unrestricted sprawl of large built-up areas and assisting in safeguarding the countryside from encroachment. The Review recommended that overall the parcels had a very low suitability as an area of search. It should be noted however, that Parcel 2 covers a large area of land and as such the overall assessment of 'low suitability' relates to the parcel as a whole.

**Figure 4: East Herts Green Belt Review, 2015: Parcels identified by PBA**



- 4.2 Further consideration of the proposed site in relation to Green Belt purposes has been carried out by Officers as part of this appraisal. Whilst Gresley Way is a strong boundary, the structural planting carried out in the mid-1990s which sits along ridgelines has created a well-contained site with a relative sense of

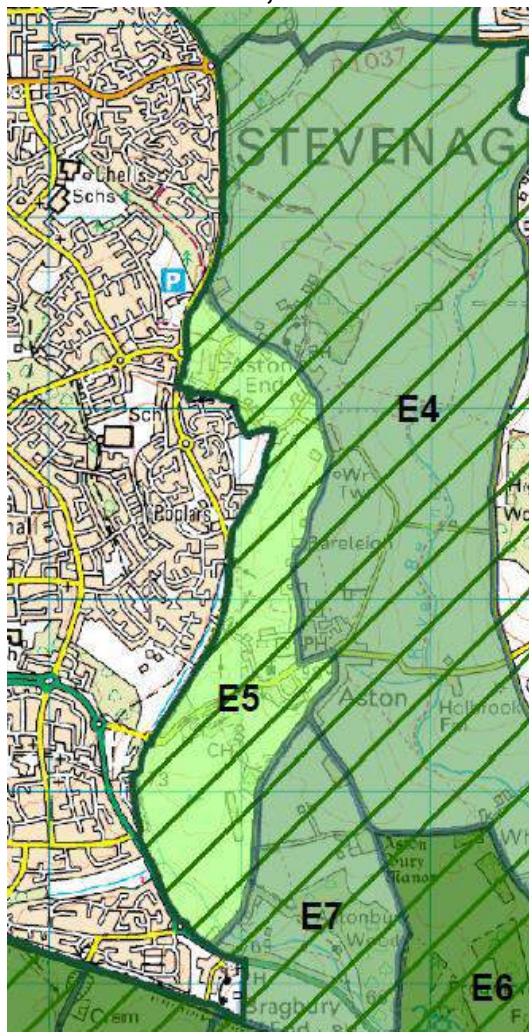


enclosure, distinct from the adjacent broad Beane Valley. The smaller parcel therefore has a more limited role in terms of preventing urban sprawl as there is a clearly defined outer edge to the site. The smaller parcel makes no contribution to preventing the merging of towns. There are two designated Rights of Way through the southern part of the smaller parcel, with access to the countryside to the east of the town prohibited by the road infrastructure of Gresley Way. Whilst the Beane Valley is a rare example of a chalk stream environment, the structural planting makes the site physically and visibly removed from the Beane Valley.

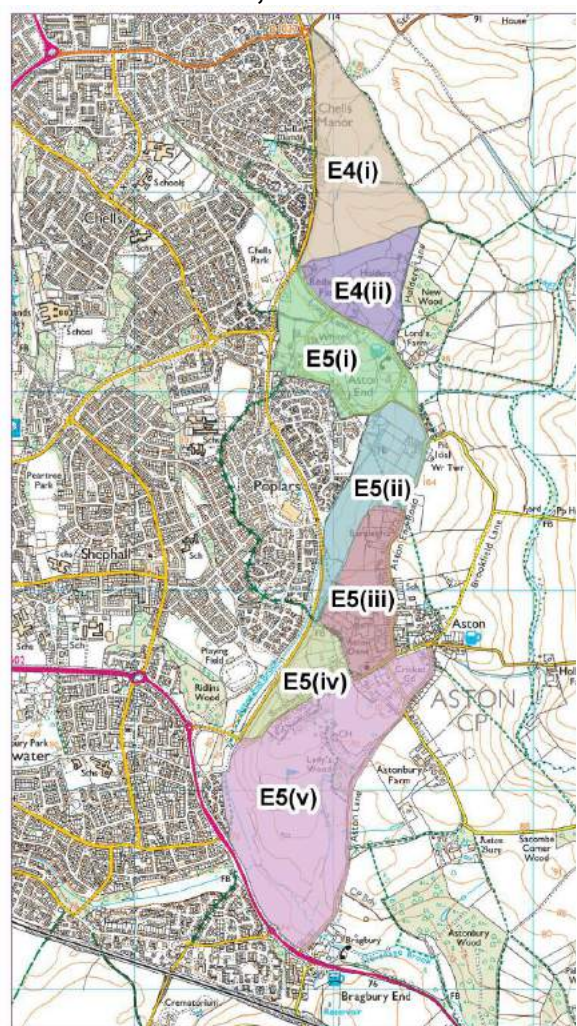
Stevenage Green Belt Review 2014/2015

- 4.3 The first stage of the Stevenage Borough Council Green Belt Review, undertaken in 2014 came to a similar conclusion as the 2015 East Herts Review.
- 4.4 This was followed by a further assessment of smaller parcels undertaken in 2015, which divided the area to the east of Stevenage into smaller distinct areas. A more detailed assessment was undertaken in relation to these distinct areas. Area E4 covers land to the east of the town, north of Aston village, with two smaller sub areas: E4(i) covers the relevant area of land being promoted, while E4(ii) covers land between the potential site and the northern edge of Aston village along Long Lane.

**Figure 5: Stevenage Borough Council Green Belt Review, 2014**



**Figure 6: Stevenage Borough Council Green Belt Review, 2015**



- 4.5 The commentary for segment E4 states that “the combination of topography, large-scale open fields, distant views and no immediate visual connection with the urban edge of Stevenage to the west, give this segment a strongly rural character and openness. As such the segment is an important part of the Green Belt to the east of Stevenage. Roads (albeit of varying size) form strong boundaries to this segment.”
- 4.6 The commentary for parcel E4(i) states that the parcel is “characterised by large scale open fields which form part of the plateau between the Beane Valley and Stevenage, this parcel makes a contribution to containing the easterly edge of Stevenage, but has been subject to extensive boundary planting which contributes significantly to its visual containment.” Parcel E4(ii) has a similar role as E4(i) and “is characterised by a more enclosed landscape of small fields in largely pastoral use, contributing to a strong sense of visual containment.” The Stevenage Review recommended the release of parcel E4(i) and the safeguarding of parcel E4(ii) for future development for 770 and 400 dwellings respectively.
- 4.7 While the Stevenage Green Belt Review is not formally endorsed by East Herts Council, the review follows a sound methodology and as the parcels are of a smaller scale, the review provides a useful more detailed independent assessment.

#### [East Herts Landscape Character Assessment 2006](#)

- 4.8 The East Herts Landscape Character Assessment, whilst this is an older document, it is considered a useful ‘sense-check’ which focuses only on the landscape and its capacity to accommodate change.
- 4.9 Land to the east of Stevenage is located within Landscape Character Area 39, the Middle Beane Valley. The assessment highlights the wide valley landscape and relative tranquility of the landscape despite its proximity to Stevenage. A key message from this assessment is that the impact of development on the eastern edge of Stevenage has been well concealed from the wider landscape and therefore has had minimal impact on the valley environment.

#### [Stevenage Landscape Capacity and Sensitivity Study 2006](#)

- 4.10 Stevenage Borough Council and North Herts District Council undertook a Landscape Sensitivity and Capacity Study in 2006 to help inform decisions about the future extent and directions of residential and employment growth around Stevenage. As with the East Herts Landscape Character Assessment, while this study is an older document, it provides a useful independent view on the potential for the landscape to the east of the town to accommodate development.
- 4.11 The Study identified smaller Local Landscape Areas using landscape features. Land to the East of Stevenage was defined as Local Landscape Character Area 6: Chells Manor Farmlands. The assessment indicates that the area has a moderate sensitivity and moderate capacity for a residential extension, i.e. that there are only likely to be minor or moderate effects on the specific

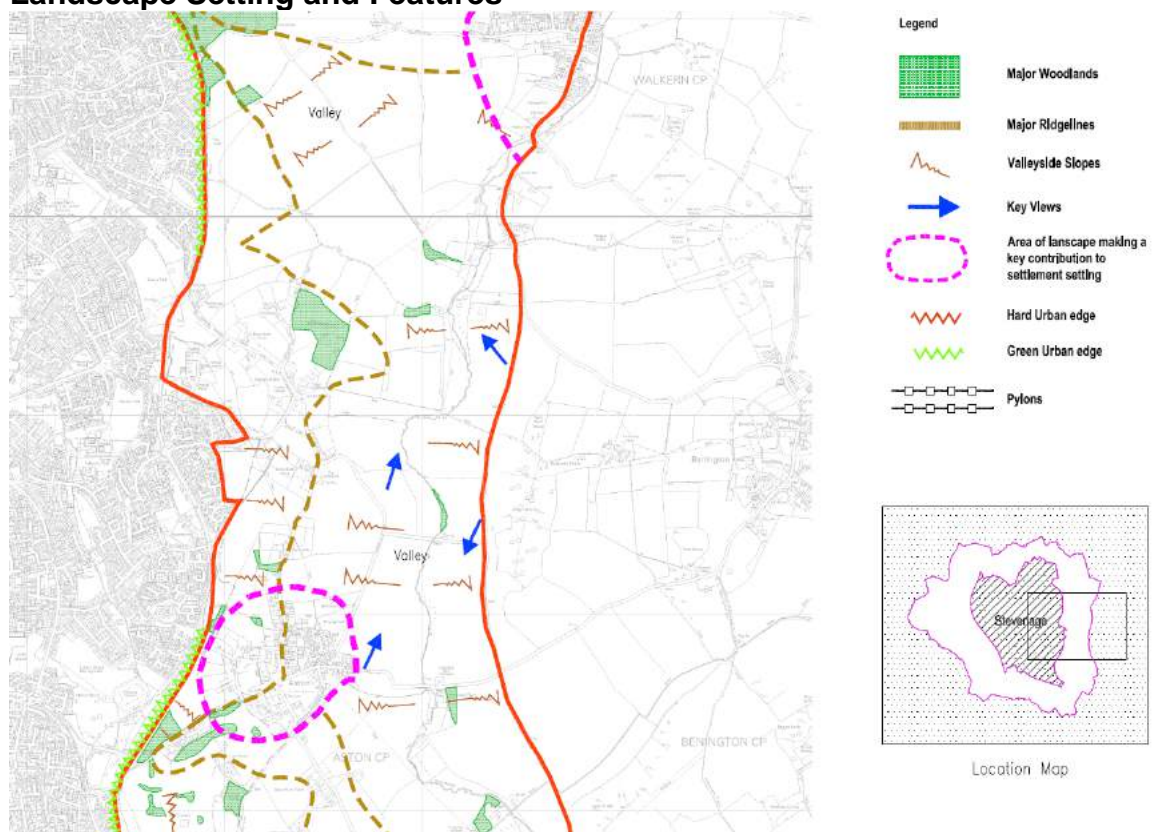


characteristics of the site from such development. The assessment suggests a number of specific landscape mitigation measures:

- Open space to the western boundary, incorporating and strengthening existing areas of advance woodland planting (to prevent wider visual impacts of urban development on the Beane Valley, conserving and enhancing its undeveloped character)
- Conservation and enhancement of the existing historic hedgerow framework
- Two storey residential development only
- Scope for possible minor adverse impacts on the Beane Valley until planting is fully established.

4.12 The assessment includes two concept diagrams; one which sets out the landscape setting and features (Figure 5b of the Assessment seen in Figure 7 below); and one which illustrates how potential development could fit within these constraints (Figure 17 of the Assessment seen in Figure 8 below).

**Figure 7: Stevenage Landscape Sensitivity and Capacity Study Figure 5b Landscape Setting and Features**



**Figure 8: Stevenage Landscape Sensitivity and Capacity Study Figure 5b Potential Development**



#### Transport Modelling 2015

- 4.13 In order to better understand the potential implications of development in this location, the Council commissioned Aecom via the County Council in May/June 2015 to look at future transport issues in response to the potential development site to the east of Stevenage and to identify mitigation proposals if required. The model tool used was the Stevenage, Hitchin Urban Model (SHUM) originally developed to assist the preparation of the Hitchin and Stevenage Urban Transport Plans. The model tested the addition of two roundabout junctions off Gresley Way to serve 750 homes and a two form-entry primary school (40% of homes (300) were assumed to be affordable homes for the purposes of trip rate calculations). 312 trips were forecast during the AM peak and 324 trips in the PM peak.
- 4.14 The study concluded that the development would not have an adverse effect on the highway network and that the two additional roundabouts on Gresley Way may have the beneficial effect of slowing vehicles down and staggering entry of vehicles to key junctions. Because the additional junctions would make the journey time along Gresley Way slightly longer, this may cause a minor dispersal of vehicles to other routes on the local road network. However, this was not considered to be an issue in terms of the performance of the network. The A602/Gresley Way junction and the A1 junctions in particular already experience congestion. The additional vehicles associated with the potential

development of 750 homes would make only a small contribution to this existing situation both when considered a standalone development and in the context of the wider anticipated growth around Stevenage.

## **5. Interim Conclusion**

- 5.1 Following consideration of the further technical work on Green Belt and transport modelling, together with further consideration of landscape matters, Officers concluded that a smaller site for up to 750 homes to the east of Stevenage could be a reasonable alternative for development should further sites be required to meet the Council's objectively assessed housing need. As such Officers considered that further work should be undertaken to assess the wider implications and infrastructure requirements arising from development in this location.

## **6. Stakeholder Engagement**

- 6.1 In order to consider the wider implications and infrastructure requirements arising from development in this location the Council invited the landowner's agents (who had by this time changed to Pigeon Land Ltd) and other statutory stakeholders to a Stakeholder Workshop which was held on 30<sup>th</sup> June 2015 to discuss the potential for around 750 homes to the east of Stevenage. In addition to East Herts Council Officers and the site promoters, the following stakeholders were represented:

- Stevenage Borough Council officers
- Herts and Middlesex Wildlife Trust
- Herts County Council – Highways (Development Management, Transport Modelling, Passenger Transport, Strategy and Programme Management)
- Herts County Council – Education
- Herts County Council – Property
- NHS England / NHS Hertfordshire
- Thames Water

- 6.2 To assist the discussion, Pigeon Land Ltd provided a concept plan detailing what development might look like at in this location.

- 6.3 The aim of the meeting was to identify the main issues that would require further testing through the District Plan. The following matters were particularly relevant:

### **Housing**

- Given the proximity of the site to Stevenage there should be consideration given to the housing needs of Stevenage in terms of the type and mix of dwellings, including the desire for aspirational housing to complement the dominance of three bedroom terraced properties in the stock of the town.
- Affordable homes should be distributed throughout the site and would meet the needs of those on the East Herts register. There should be a steady flow of provision.



### **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 best practice.

### **Transport**

- Only a small proportion of the trips generated by the site head east, with the rest moving towards the town centre and the A1(M). Key constrained parts of the network such as the A602/Monkswood Way, A602/Gresley Way and A1 junctions would not be adversely affected by the additional movements.
- The provision of a primary school within the site would mean the majority of the trips associated with the school would be within the neighbourhood, although some external trips would be generated through teacher movements and parental choice.
- Cycleways and footpaths should be provided to ensure connectivity to existing neighbourhoods as well as bus routes and bus stops. Detail such as bus route alignment would need to be addressed through masterplanning.

### **Waste Water**

- Sewerage capacity issues at Bragbury End were noted, upgrades will be needed as well as on-line storage.

### **Education**

- All primary schools in the school planning area are operating at or near capacity and forecasts suggest that this will continue. A two-form entry primary school with early-years provision would be required on a relatively flat site of approximately 2.5ha.
- There will be a deficit of secondary school places of three-forms of entry by 2021.

### **Biodiversity**

- The site currently has a relatively low ecological value; any development should therefore result in a net gain in biodiversity across the site. Detailed ecological assessments should be undertaken and mitigation planned for appropriately. Sustainable drainage should be integrated into the design and there are likely to be the key opportunities to create an ecologically rich and multi-functional environment.

### **Healthcare**

- NHS primary care provision would be required to serve residents as well as secondary care facilities. Multi-use facilities are the preferred format which offer a greater capacity but are more expensive. Modelling work is ongoing to determine the need for new or the expansion of existing facilities.
- The care home element of the site would generate a considerable demand for primary care services.

## **7. Developer Meetings/Information**

- 7.1 Following the Stakeholder Workshop several meetings have been held with Pigeon Land Ltd. The meetings have focused on discussions over the principal

of development in this location and what an evolving masterplan should consider addressing the issues raised at the Stakeholder Workshop in particular.

- 7.2 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. Officers consider that the Draft Delivery Statement for land to the east of Stevenage provides sufficient assurance that the issues raised have been or are capable of being addressed and that all supporting infrastructure can be provided.
- 7.3 These statements in their final form will contain details about required infrastructure and utilities and will be used to support the submission of the Plan to the Planning Inspectorate. The Draft Delivery Statements form the basis of the Deliverability Assessment below.

## **8. Deliverability Assessment**

### **Introduction**

- 8.1 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 that a 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.

### **Aims & Objectives**

- 8.2 Development on land to the East of Stevenage will create an urban extension to the town. The site will provide a mix of tenure, including affordable and aspirational homes as well as a care home for retirement living and a site for Travelling Showpeople. The new homes will be supported by a range of community facilities located around a central hub including a primary school with early-years provision.
- 8.3 Accessed directly off Gresley Way, the site will support bus routes, cycle and pedestrian routes along a clearly defined road hierarchy incorporating tree-lined avenues and smaller residential roads. Open spaces will be provided which provide multi-functional drainage solutions as well as space for recreation, creating connections to the wider open countryside of the Beane Valley. Consideration of these place-making objectives has led to the conclusion that a lower site capacity is appropriate, and as a result, a figure of 600 homes has been identified as being deliverable.

## Identification of site constraints

### Green Belt

- 8.4 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 Stevenage. 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.

### Minerals

- 8.5 The land is outside the sand and gravel belt; therefore no prior extraction is required.

### Land Contamination

- 8.6 There are no previous land uses recorded on this site that may have caused land contamination.

### Surface Water Flooding

- 8.7 The site does not contain any flood zones, but there are two narrow channels along which surface water flooding may occur. These can be accommodated into the masterplanning of the site through the creation of attenuation ponds which have multiple purposes such as providing a means of natural filtration and as part of an area of open space.

### Heritage Assets

- 8.8 There are no known heritage assets on the site, however, as with a large proportion of the District, there may be unrecorded archaeological assets that will need to be considered and treated accordingly.

### Beane Valley Landscape

- 8.9 The greatest concern in terms of environmental impact is the relationship of the site with the Beane Valley, one of the world's rarest chalk stream environments. The Beane Valley is a wide open landscape with long views into and across the valley. Studies have shown however, that this site is well contained by structural planting which has defined the outer edge of the site and also created visual barriers within the site along particular contours, further shielding views from the current edge of Stevenage, from within the site towards the valley, and from the opposite side of the valley towards the site. The existing urban edge of the town is well-screened by a bund and established tree line. Where this has to be 'punched through' to create the new access points, special attention could be given to how this occurs without reducing this barrier, whilst also facilitating a visual connection between the site and the wider countryside.

- 8.10 In terms of the biodiversity and ecology of the site, there are no wildlife designations on the site and as an intensively farmed agricultural field, the current biodiversity is relatively low. However, existing trees, hedgerows and surface water features would need to be retained on the site with further enhancements made to the biodiversity of the site through on-site mitigation such as buffer and boundary planting, and the installation of bird and bat boxes for example.

### Proximity to Aston Village

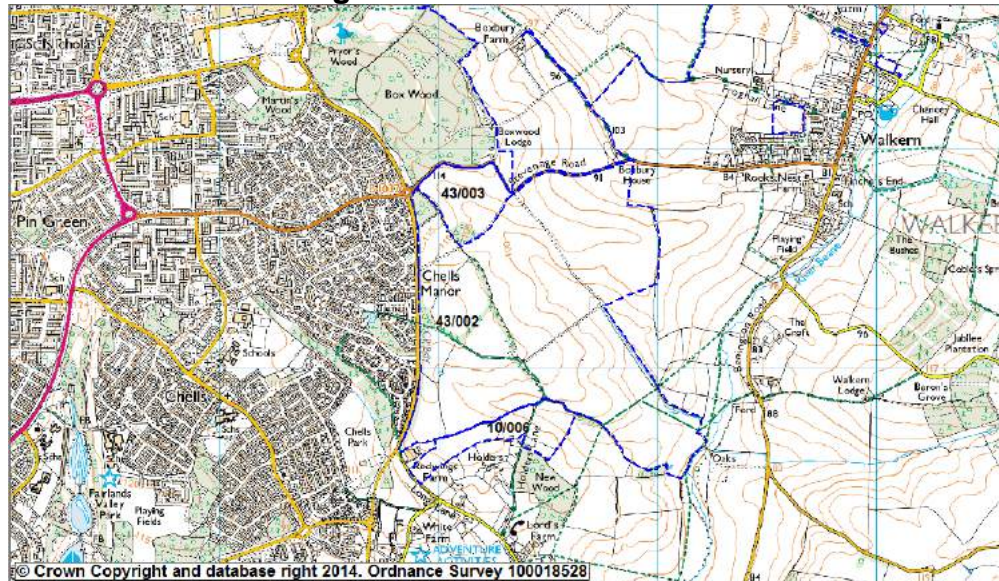
- 8.11 The site is located within the Parish of Aston which runs parallel to the east of Stevenage, extending to Box Wood to the north down to Watton-at-Stone and Datchworth to the south. There is currently no Neighbourhood Plan for the parish. The village of Aston is the Parish's main settlement, with Aston End forming a dispersed hamlet of farm holdings and individual houses to the north of the Parish, and Hooks Cross a hamlet which straddles the A602 to the south. The closest property to the site is Holders Cottage, Holders Lane in Aston End, which has extensive grounds (a remnant of historic agricultural enclosures). There is a tree belt which runs along the southern edge of the site which provides screening which is approximately 100 metres from the property. The site promoter's initial masterplan and the Council's concept diagram locates an open space within the south-eastern corner of the site, thus ensuring that the views from the Holdings remain largely open. Oblique views of some rooflines may be possible depending upon the final masterplan, but given the distance from the property, this is not considered to be a harmful impact.

### Consideration of Alternative Sites

- 8.12 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 Stevenage 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.
- 8.13 Hythe Ltd submitted land totaling some 248 hectares to the Call for Sites which informs the Strategic Land Availability Assessment (SLAA). SLAA site 43/002 covers land to the east of Gresley Way, wrapping around Box Wood, north of the village of Aston as shown in Figure 9 below.
- 8.14 The SLAA assessment of the site as a whole concluded that 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 and would be subject to the review of the Green Belt in this location.
- 8.15 As has been documented in Section 1 of this appraisal, a considerable number of alternative approaches to development have been considered throughout the Plan-making process. The Council is charged with seeking to meet in full its objectively assessed housing need (16,400 homes), and in particular to ensure there is a rolling five year supply of land available to meet this need. Matters such as the requirement for major strategic infrastructure interventions are preventing other sites from coming forward early enough in the Plan period. It is the lack of delivery of such infrastructure that prevents alternative options such as new standalone settlements from being deliverable within the Plan period, even if sufficient land was available. As such, the alternative option of diverting development to areas beyond the Green Belt, i.e. in the rural area beyond the Green Belt would not represent a sustainable form of development.



**Figure 9: SLAA Site 43/002**



### **Duty to Co-operate**

- 8.16 Several Duty to Co-operate meetings have been held both between officers and at Executive Member level with Stevenage Borough Council. Records of each Member level meeting are reported to the District Planning Executive Panel and published on the Council's website. A Memorandum of Understanding has been jointly prepared to assist with each council moving forward to examination.

### **Land uses and proposals**

- 8.17 Land at Gresley Park will provide a new neighbourhood of approximately 600 homes. A neighbourhood centre located at the heart of the community would provide for local convenience retail needs, a healthcare facility (if necessary), a primary school with sufficient land to accommodate two forms of entry and a pre-school, a care home and assisted living properties, all located around a multi-functional open space. This pattern of development centred around a neighbourhood centre reflects the pattern of growth in Stevenage. The site will provide a mixture of house sizes and tenures to provide both affordable and aspirational homes in a highly accessible location which will be integrated with existing communities through safe footpath and cycle links. The site will be expected to make land available for self-build and custom-build properties.
- 8.18 The Council's recent Accommodation Needs Assessment of Gypsies and Travellers and Travelling Showpeople concludes that nine Travelling Showpeople plots are needed over the Plan period, with seven of these to be delivered within the first five years of the Plan.
- 8.19 Land to the East of Stevenage is considered a suitable location for the delivery of a site due to the ease of access to the principal road network, access to services and because, being a strategic scale development, a site could be planned comprehensively as part of the wider masterplan. With such sites being limited in opportunity, this site is considered by Officers as being able to accommodate a proportion of the immediate needs arising. Therefore a site for

at least five pitches will be expected to be provided on the site within the first five years of the Plan, the details of which will be resolved through the masterplanning process.

- 8.20 It is an important consideration when preparing the masterplan that the quantum of development and the resultant land take is of a scale that can fit within the area of land that is already physically and visibly enclosed. Existing boundary planting will be maintained and reinforced where necessary to ensure that the development is well screened from within the Beane Valley and from the opposite west-facing valley side. The site is not visible from the nearest roads on the opposite valley side due to the intervening landscape and ridgelines. Given the distance from these vantage points even if glimpsed views of rooftops were to occur it is not considered that this view will be harmful. However, it is proposed that buildings do not generally exceed two storeys in height.
- 8.21 The development will take the form of a new neighbourhood in order to encourage walking and cycling to the neighbourhood centre and local school, and existing bus routes must be extended into the site creating bus connectivity to Stevenage 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.
- 8.22 Sustainable Urban Drainage will be incorporated into the layout of the development and will create multi-functional green spaces. Distinct character areas will be created within the development which will contain tree-lined avenues and streets to create urban greening and create a net gain in terms of biodiversity across the site, which is currently arable farmland.

### **Infrastructure needs**

- 8.23 Development of 500 homes would normally trigger the need for a single form of entry at primary school level. As capacity constraints have been identified with regard to the local primary schools, the County Council have indicated that sufficient land should be provided to facilitate a primary school of two forms of entry plus an early-years facility to provide for increased demand from the local catchment over time. At secondary school level, the County Council has indicated that secondary schools within Stevenage will be at capacity. However, the Council plans to bring back in to use the former Barnwell East school, which would serve the needs arising from the town as well as approximately one form of entry arising from the development at Gresley Park.
- 8.24 An important part of any neighbourhood is access to local primary healthcare facilities such as doctors and dentists. These facilities if provided will also serve the wider town.
- 8.25 The transport modelling commissioned by the Council tested two access points from Gresley Way. Hertfordshire Highways has indicated however, that they have no 'in principle' objection to the creation of three access points, though further detailed consideration would be required. The site promoter is suggesting three development parcels each with its own access via new roundabouts onto Gresley Way together with drainage and utilities

infrastructure to serve three home builders on site at once to enable early delivery of homes within the first five years of the Plan period. Transport modelling undertaken by Aecom identified the need to upgrade the Gresley Way/A602 junction and recommends an improvement scheme. This scheme is estimated at £426,000 towards which the development would be expected to contribute significantly if not in total.

- 8.26 Ideally the design and layout should be such that it avoids conflicts of vehicle movements through residential estate roads between Travelling Showpeople and the settled community. Further consideration of these sorts of issues can be determined through the masterplanning process.
- 8.27 The northern part of the site has underlying chalk and so may be suitable for infiltration drainage falling to an infiltration pond. The southern part of the site will need to be served by attenuation basins that will outfall to the existing surface water sewer in Gresley Way. If subdivided in to development parcels, each parcel could have its own surface water drainage infrastructure. Thames Water have confirmed that the Rye Meads Waste Water Treatment Works has the capacity to serve the development. The development can access existing foul water connection points within Gresley Way.
- 8.28 Utility plans indicate that adequate connections to the requisite services can be achieved. It is intended that the overhead electricity cables can be buried in a manner incorporated into road layouts and through the creation of new wayleaves. This will further reduce the visual impact of development in this location.

### **Delivery Study**

- 8.29 The East Herts Strategic Sites 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 land to the East of Stevenage, it did test the financial viability of different site typologies. The study concluded that development schemes in the District, particularly in those areas adjacent to neighbouring settlements 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.

### **Implementation Route Map: Masterplan, Phasing and Delivery**

- 8.30 The site will be allocated in the East Herts District Plan for 600 homes plus a site for Travelling Showpeople. The Green Belt boundary will be redrawn along the landscape belt, thus defining the outer edge of the development. The site promoter is willing to enter into a Planning Performance Agreement which will set out the timescales for agreeing the masterplan with Officers prior to a period of public engagement. It is the intention that the proposal will be submitted to the Council as a planning application prior to the Examination in Public, with the decision not anticipated until after formal adoption of the District Plan. This approach will illustrate to the Inspector that the proposal is fully deliverable, without prejudicing the decision-making process of the authority.

- 8.31 The Council requested in March 2016 that site promoters representing the proposed allocations submit a Draft Delivery Statement which will form the basis of a Statement of Common ground for the examination in Public. The site promoters provided an indicative phasing plan which, based on having three house-builders on site, building at the same time, each with an access from Gresley Way suggests that the development could be complete within the first five years of the Plan period. The Draft Delivery Statement also suggests it would be possible to have two house-builders on site and still complete within five years. However, the start date of delivery will need to be amended along current anticipated timescales, with adoption of the District Plan not anticipated until late 2017.
- 8.32 The community hub, bus routes, cycle and pedestrian links will 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. The Draft Delivery Statement indicates that the proposal is viable and deliverable.

## 9 SA Objectives

- 9.1 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 Stevenage 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*

- 9.2 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 tree-lined avenues and will increase tree planting across the site. 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*

- 9.3 Whilst ecology interests on the site is limited, there are two wildlife sites near to the proposed allocation: Box Wood, which lies to the north of the site and New Wood to the south of the site. A phase 2 survey for reptiles has indicated that there are no newts present in the shallow pond within the site. There is low biodiversity value within the areas of arable woodland, however, the woodland belts and hedgerows have the potential to support bats, birds dormice and badgers. Mitigation will therefore be required which will be achieved through the retention and positive management of mixed plantation woodland, landscape belts and enhanced green infrastructure corridors through the site.



### *Community and Wellbeing*

- 9.4 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 community hub will provide for a primary school with pre-school facility along with local shops and healthcare services. The use of cycle-ways and footpaths will connect the site to the existing town and a fit-trail has been proposed by the site promoter and would be designed around the site.

### *Economy and Employment*

- 9.5 The Stevenage Local Plan seeks for a proportion of new homes to be 'aspirational homes', larger (four bedroom plus) semi or detached properties to provide an alternative to the dominant Stevenage housing stock of three bedroom terraced properties. This approach also seeks to retain workers who would otherwise seek housing outside of the town. The education, retail, care home and healthcare facilities will also provide local job opportunities. The site is located relatively close to the Pin Green Industrial Estate and Gresley Way offers transport options to enable access to the town centre and to the A602.

### *Historic Environment*

- 9.6 The site lies outside a defined Area of Archaeological Significance. However, with all developments the Council requires assessments to be undertaken prior to development occurring. The Delivery Statement indicates that a preliminary archaeological appraisal sets out that there is evidence of prehistoric and Roman activity within the surrounding area and as such, a more detailed archaeological assessment should be undertaken prior to development. This will need to be timed to prevent delay to commencement of development on site.

### *Housing*

- 9.7 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 Travelling Showpeople. The site is proposed to come forward within the first five years of the Plan period.

### *Land*

- 9.8 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, being arable fields there is therefore no contaminated land to remediate.

### *Landscape*

- 9.9 Despite its proximity to the Beane Valley, the site is well contained and screened from the more open landscape of the valley. Mature tree belts and hedgerows will be maintained and enhanced and the design layout will incorporate tree-lined avenues and areas of open space and water features. The topography will dictate the layout and density of development to maintain a softer outer edge and to ensure building heights on areas of higher ground are appropriate.

### *Low Carbon Development*

- 9.10 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*

- 9.11 The development site is well located to provide good connections to and extend the network of off-road cycle routes that traverse the town. Cycleways and footpaths will be incorporated into the design along with safe crossing points to provide pedestrian connectivity to the existing town. Existing bus routes must be extended to run through the development. Transport modelling indicates that anticipated levels of vehicle movements generate by this development would not adversely affect the wider highway network, though the A602/Gresley Way junction will need enhancements.

### *Water*

- 9.12 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.

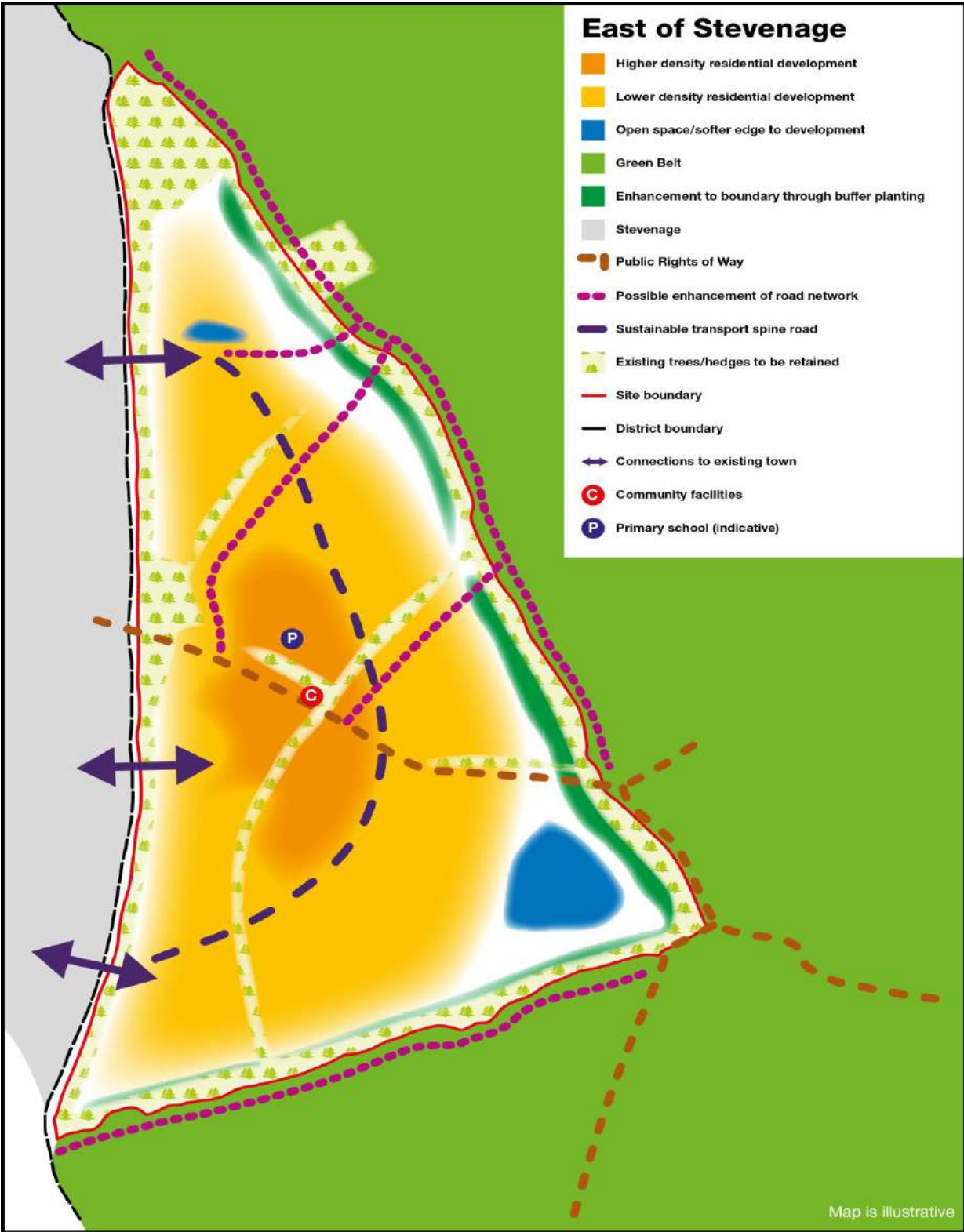
## **10 Conclusion**

- 10.1 The Council has undertaken consideration of the potential for development on land to the East of Stevenage through this appraisal, which includes the consideration of smaller parcels of land. 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 area to the east of Stevenage would not in itself suggest that the land would be suitable for Green Belt release. However, it should be noted that the Green Belt 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.
- 10.2 On balance it is considered that, in order to allow for an urban extension to the sustainable settlement of Stevenage, it would be appropriate to allow some Green Belt release in this instance in order to meet identified housing need.
- 10.3 Notwithstanding a number of constraints, the site is well contained by an established tree line, is accessible from Gresley Way and is sufficient distance from the nearby village of Aston, to not impact visibly or physically. Sufficient

safeguards can be put in place to ensure that tree belts and landscape features are maintained.

- 10.4 The site will provide new homes in an established travel to work corridor and will provide new employment opportunities. The site will not only provide for a range of housing types including much needed affordable housing and homes for older people, but it will provide an opportunity to create more aspirational homes to assist in the regeneration ambitions of Stevenage Borough Council, retaining homeowners that would otherwise need to look outside the town for larger, semi-detached or detached homes.
- 10.5 The site will provide a number of benefits to both the new and existing community, namely through the provision of a new school and other community facilities. The site will also contribute towards the improvement of infrastructure which is necessary to support the wider growth within the town, namely the reinstatement of Barnwell East Secondary School and improvements to the A602/Gresley Way junction. The primary school and early-years facility will be in the centre of the development alongside community facilities, serving to create a focal point for the new community. The new school and healthcare facilities will also serve the wider population.
- 10.6 Importantly, this site is the only location which can provide a site to meet the identified accommodation needs of Travelling Showpeople which can be delivered 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.
- 10.7 As the site lies adjacent to the administrative boundary of Stevenage and East Herts, this site provides an 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 will provide opportunities for local engagement in the planning of the new neighbourhood. It will also provide assurances over the immediate delivery of development required to meet the objectively assessed needs in the first five years of the Plan period. It is therefore proposed that this site becomes an allocation within the East Herts District Plan for strategic development of 600 homes and supporting community infrastructure.
- 10.8 Figure 10 below shows an illustrative conceptual diagram 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.

Figure 10: Illustrative Concept Diagram



## Chapter 12 East of Stevenage

### 12.1 Introduction

- 12.1.1 Stevenage is a Mark I New Town designated in 1946 as part of the Abercrombie plan for the establishment of settlements around London. The town has grown in several stages, shaped originally around six distinct neighbourhoods, each with a neighbourhood centre and local schools. The town is bordered to the west by the A1(M), which facilitated the growth of an extensive employment corridor at Gunnels Wood. As such, Stevenage is home to many large corporations and a wide variety of small to medium sized employers, making the town a key destination and employment centre.
- 12.1.2 Land to the east of Stevenage was assessed through the Plan-making process for either a new settlement or a major urban extension, but was not identified as part of the Preferred Options District Plan. The 2014 consultation raised the issue of the potential of a smaller parcel of land coming forward for development. A detailed assessment of the potential for development in the area has been undertaken which is documented in the Settlement Appraisal accompanying the Plan.
- 12.1.3 As a result, a site of approximately 37 hectares of land to the east of Gresley Way, Stevenage has been identified as being suitable and is therefore allocated for development in the East Herts District Plan, to deliver approximately 600 homes within the first five years of the Plan period. The site will be referred to as Gresley Park.
- 12.1.4 As the development abuts the edge of Stevenage, the site will need to be planned in collaboration with Stevenage Borough Council. However, as the site is wholly within the administrative boundary of East Herts District, East Herts Council is the relevant Local Planning Authority. Nonetheless, the Council will work with Stevenage Borough Council, Hertfordshire County Council (in its capacity as education

and highways authority), landowners and other key stakeholders to produce a masterplan for Gresley Park.

## **12.2 Development East of Stevenage**

12.2.1 The main components of the development strategy for land to the east of Stevenage at Gresley Park subject to master planning are expected to consider the following:

12.2.2 **Housing:** Stevenage is home to many large employers and is a key employment destination for residents in East Herts. As such, housing to the east of Stevenage is well located in relation to the services and employment in the town and would contribute towards meeting the East Herts District housing needs. The site will provide a new neighbourhood comprising a mixture of house sizes and tenure, including affordable homes, a care home and homes for older people. Stevenage Borough Council's regeneration ambitions would be supported by dwellings which are attractive to workers who would otherwise look outside the town for their housing needs. The site will also provide for the accommodation needs of Travelling Showpeople and make provision for self-build and/or custom-build opportunities.

12.2.3 **Education:** the site will provide a two form entry primary school with Early Years Education facilities. This will meet the educational needs arising from the development as well as providing additional capacity to address wider needs. Secondary education will be provided at the new school planned for the nearby former Barnwell East Secondary School site, towards which the development will contribute.

12.2.4 **Transport:** the site is well located for access in to Stevenage and beyond via Gresley Way and the A602. The site is also well located in terms of connecting to existing bus services to the town centre and station. A route running through the site for bus uses will ensure that all residents are within easy walking distance of bus stops. The establishment of a bus route through the site at the start of occupation will encourage use of the network. Cycle and foot links

will be provided to connect with the existing network in Stevenage and to the wider countryside.

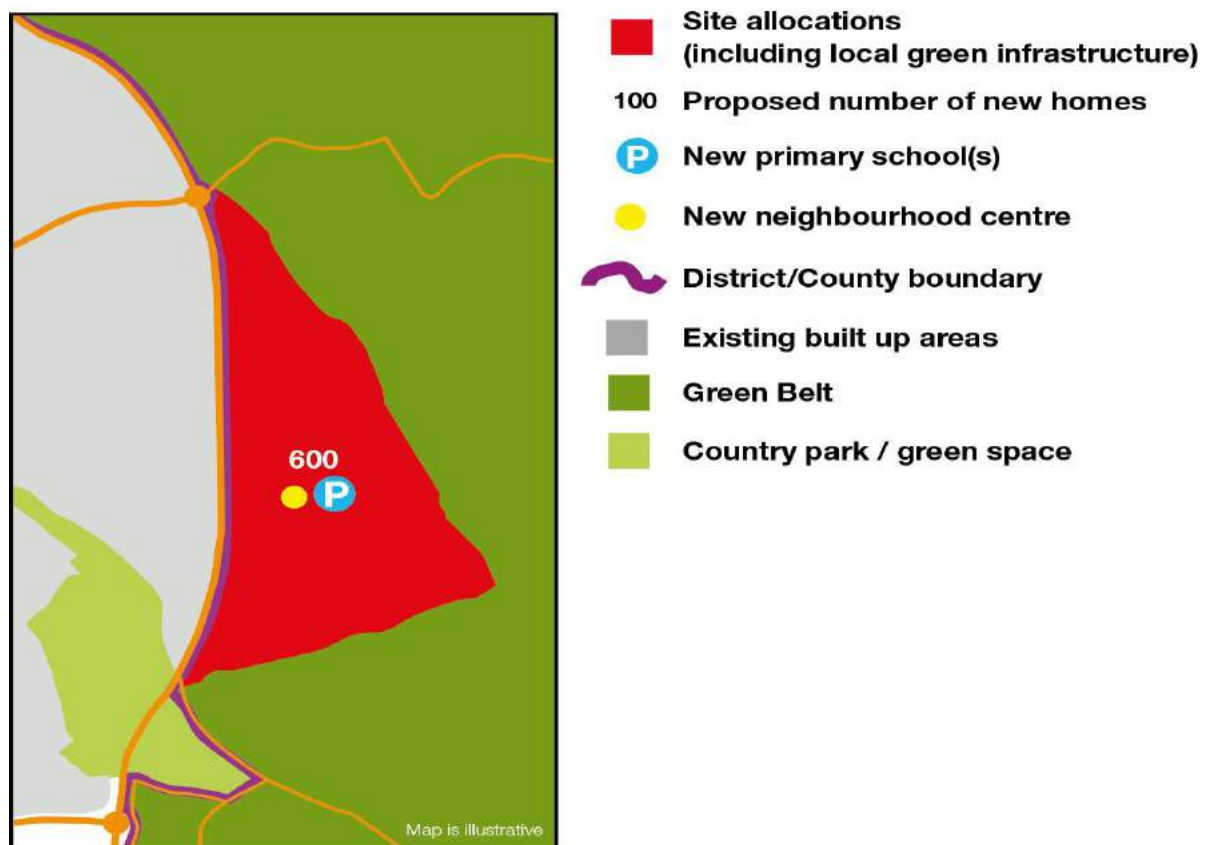
- 12.2.5 Mitigation will be required on the local highway network, including improvements to the Gresley Way/A602 junction. The development will need to ensure that existing Bridleways (Aston 004 and Aston 021) are maintained and new routes are provided to connect the site to Stevenage to the west and to the wider countryside to the east.
- 12.2.6 **Other Infrastructure:** waste water will drain to Rye Meads, 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. Sustainable drainage features will also be required on the site. In addition, a serviced area of land will be required to accommodate a site for Travelling Showpeople. If required, a healthcare facility can be provided within the neighbourhood centre.
- 12.2.7 **Employment and Retail:** The site is well located in terms of access to the Pin Green Industrial Estate to the east of the town and Gunnels Wood to the west via the A602. Gresley Way is well connected to the town centre via Martins Way. There will also be employment and retail opportunities within the neighbourhood centre, school and care home provided as part of the development.
- 12.2.8 **Character and design:** The site is well screened from the wider landscape by the surrounding woodland belts and a ridgeline to the east of the site will shield the site from within and opposite the Beane Valley. The site's gentle undulations and existing tree belts and hedgerows will help to define the character of areas within the site. Further planting to define open spaces and outer boundaries would be incorporated into the development.
- 12.2.9 The masterplan will set out a hierarchy of roads differentiating between the central tree-lined avenue, secondary streets and estate roads. The masterplanned approach will ensure good quality place-



making and the highest quality design and layout across the development resulting in a distinctive character. An attractive network of connecting paths and cycleways which connect in to the existing Stevenage cycle network will be integral to the character of Gresley Park along with visible and physical connections that provide access to the Beane Valley without prejudicing the strength of the outer boundaries of the site. This will also enable a range of journeys to be made by foot and cycle providing opportunities for health and leisure activities.

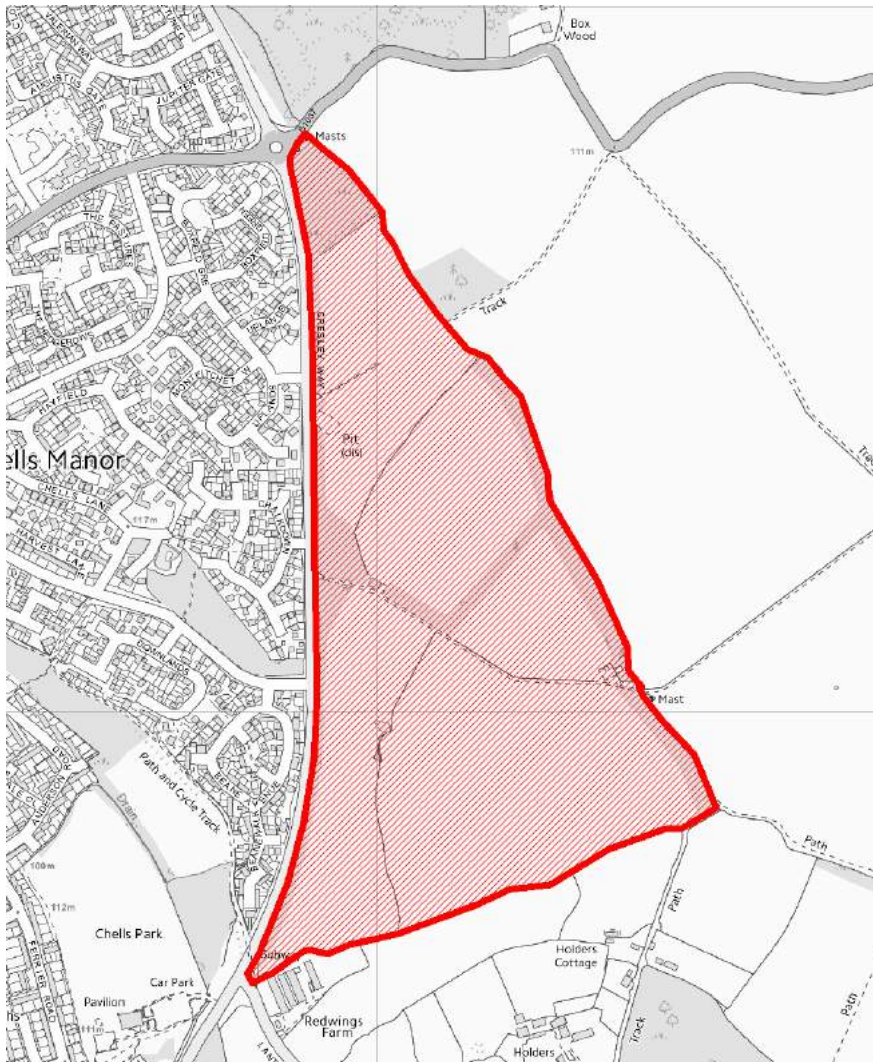
12.2.10 The main features of the policy approach to development East of Stevenage are shown in Figure 12.1 below.

**Figure 12.1: Key Diagram for East of Stevenage**





**Figure 12.2 Site Location: East of Stevenage**



### **Policy EOS1 Land East of Stevenage**

I. In accordance with Policy DPS3 (Housing Supply 2011-2033), land at Gresley Park is allocated for development to accommodate approximately 600 new homes by 2022.

II. 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.

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

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

(e) provision of a serviced site for Travelling Showpeople which should deliver five plots (each of sufficient size to allow for the provision of accommodation and equipment plus storage/maintenance) in accordance with Policy HOU9 (Gypsies and Travellers and Travelling Showpeople);

(f) education facilities, including land for a two-form entry primary school with an Early Years facility;

(g) a neighbourhood centre in an accessible location, providing local retail and community uses including a healthcare facility;

(h) access arrangements and local highways and wider strategic mitigation measures, including improvements to the A602/Gresley Way junction;

(i) sustainable transport measures which encourage walking and cycling through the site, including:

- the provision of cycleways and footways that provide links into Stevenage including existing cycle networks;
- enhancement of existing bridleways and footpaths connecting the site to the Beane Valley to the east of the site;
- enhanced passenger transport services including the creation of a sustainable transport route through the site;

(j) responds to the existing landform to define individual character areas, incorporating existing landscaping within the new streets, paths and spaces, enhances the outer boundary of the site and creates a net gain to biodiversity through additional planting;

(k) incorporates sustainable drainage and provision for flood mitigation;

(l) 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;

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

(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.

IV. 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.

12.2.11 Figure 12.3 is an illustrative strategy diagram which will be used as a basis for masterplanning and will also help inform decisions on planning applications.

Figure 12.3: Strategy Diagram for East of Stevenage

