

# Chapter 6

## Conclusions

## Chapter 6 Conclusions

### 6.1 Introduction

**6.1.1** This final chapter presents the conclusions of the Supporting Document. This section begins with an overview of the evidence base and the procedure in the Supporting Document to date, and concludes with an explanation of the assessment methodology in Chapter 6 and how this relates to other parts of the process for formulation of the draft District plan.

#### Evidence base

**6.1.2** The evidence base for Chapter 6 is as follows:

- Sieve 1: Area Assessments
- Sieve 2: Settlement Evaluations
- Sieve 3: Options Refinement
- Developer Questionnaires and ATLAS developer information
- Green Belt Review
- Transport Briefing Note
- Schools Briefing Note
- Infrastructure information

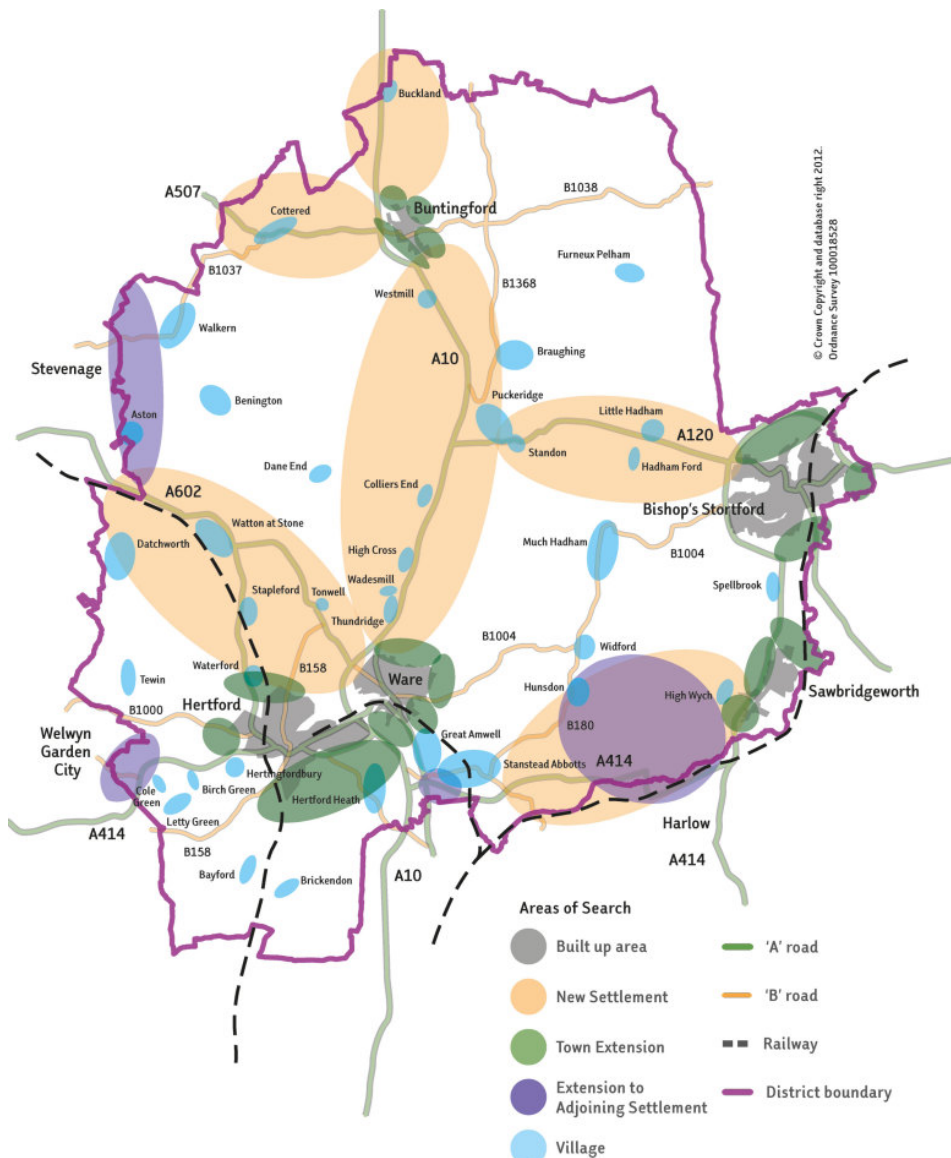
**6.1.3** Following a review of the main issues in Chapter 2, Chapter 3 established 21 topics supported by clear assessment criteria to form a consistent framework for assessment, and identified 69 'areas of search' for testing, as shown in Figure 1. Informed by this framework, Chapter 4 then assessed each of the 69 areas in Sieve 1, and looked at wider strategic context in Sieve 2. A number of options dropped out from further consideration after Sieve 2, and these are shown in Table 6.1 below. Chapter 5 then refined the options in Sieve 3, with Sieve 3a assessing the remaining areas in terms of economic development, and Sieve 3b looking at urban form. Although this supplied further important evidence, no further options dropped out at Sieve 3.

**6.1.4** Further information was collected from questionnaires issued to landowners and developers at the shortlisted areas of search in summer 2012. The Homes and Communities Agency's specialist planning team (ATLAS) were requested to pursue follow-up questions at the larger and more complicated options. All the landowner and developer information, including the questionnaires and the information submitted in response to ATLAS are available on the Council's website at [www.eastherts.gov.uk/developerinfo](http://www.eastherts.gov.uk/developerinfo).

**6.1.5** The Green Belt Review was presented to the District Planning Executive Panel in two parts. Part 1 was presented to the Panel on 3rd October 2013 and Parts 2-6 were presented on 3rd December 2013.

**6.1.6** Hertfordshire County Council is the responsible body for education and transport. The Schools Update was presented to the District Planning Executive Panel on 3rd October 2013 and the Transport Briefing Note was presented on 3rd December 2013. Information on other infrastructure areas has been drawn on, and this will be presented all together in an Infrastructure Topic Paper at the District Planning Executive Panel on 16th January 2014.

**Figure 6.1 Original 69 areas of search, March 2012**



**6.1.7** See Supporting Document Chapter 4: Places, presented to the District Planning Executive Panel on 29<sup>th</sup> March 2012.

**Table 6.1 Results after Sieve 1 and Sieve 2**

| No. | Area   | Location Test Figure | Carried forward? |
|-----|--|----------------------|------------------|
| 1   | Bishop's Stortford Built-Up Area   | 1,233                | Yes              |
| 2   | Bishop's Stortford North   | 2,500                | Yes              |
| 3   | Bishop's Stortford East  | 150                  | Yes              |
| 4   | Bishop's Stortford South (Sub-area A only)   | 800                  | Yes              |
| 5   | Buntingford Built-Up Area  | 67                   | Yes              |
| 6   | Spread of development within areas 6B &C, 7A, 8B and 9, at various levels between 500 and 2,000 dwellings. | Up to 2,000          | Yes              |
| 7   |  |                      |                  |
| 8   |  |                      |                  |
| 9   |  |                      |                  |
| 10  | Hertford Built-Up Area   | 875                  | Yes              |
| 11  | Hertford West (sub-areas A and B)  | 600                  | Yes              |
| 12  | Hertford North (sub-area C only)   | 100                  | Yes              |
| 13  | Hertford South (sub-area C only)   | 100                  | Yes              |
| 14  | Sawbridgeworth Built-Up Area   | 111                  | Yes              |
| 15  | Sawbridgeworth South   | 0                    | No               |
| 16  | Sawbridgeworth West  | 200 or 3,000         | Yes              |
| 17  | Sawbridgeworth North   | 0                    | No               |
| 18  | Ware Built-Up Area   | 147                  | Yes              |
| 19  | Ware North (A and B). Development options at different scales in 19B                                       | 200 or 1,700         | Yes              |
| 20  | Ware East (sub-area A only)  | 1,300                | Yes              |
| 21  | Ware South-East  | 0                    | No               |
| 22  | Ware South-west  | 0                    | No               |

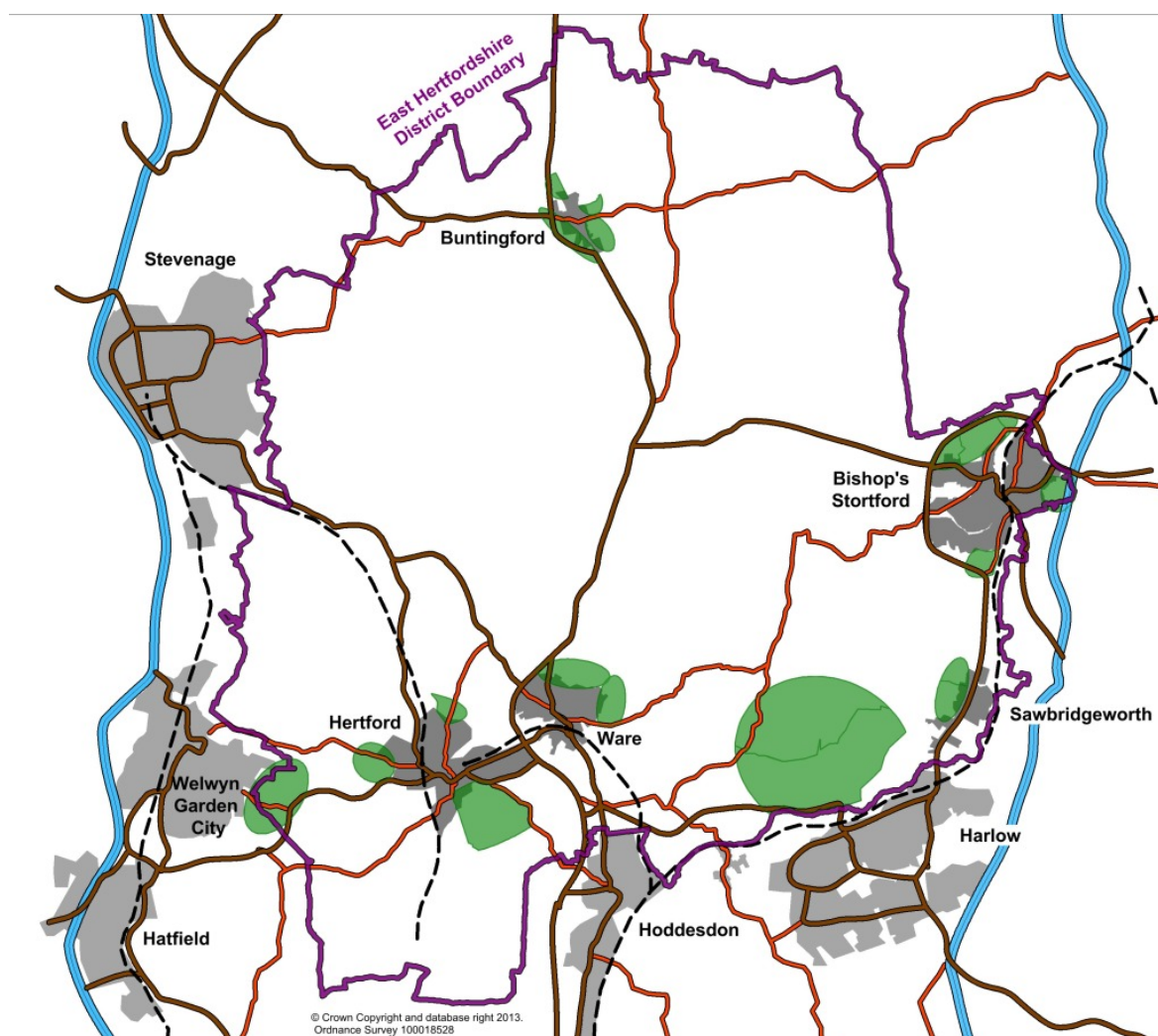
| No. | Area            | Location Test Figure | Carried forward? |
|-----|-----------------|----------------------|------------------|
| 23  | Aston           | 23                   | Yes              |
| 24  | Bayford         | 7                    | Yes              |
| 25  | Benington       | 0                    | No               |
| 26  | Birch Green     | 9                    | Yes              |
| 27  | Braughing       | 34                   | Yes              |
| 28  | Brickendon      | 0                    | Yes              |
| 29  | Buckland        | 7                    | Yes              |
| 30  | Cole Green      | 2                    | Yes              |
| 31  | Colliers End    | 5                    | Yes              |
| 32  | Cottered        | 19                   | Yes              |
| 33  | Dane End        | 26                   | Yes              |
| 34  | Datchworth      | 0                    | No               |
| 35  | Furneux Pelham  | 13                   | Yes              |
| 36  | Great Amwell    | 0                    | No               |
| 37  | Hadham Ford     | 11                   | Yes              |
| 38  | Hertford Heath  | 0                    | No               |
| 39  | Hertingfordbury | 8                    | Yes              |
| 40  | High Cross      | 15                   | Yes              |
| 41  | High Wych       | 18                   | Yes              |
| 42  | Hunsdon         | 37                   | Yes              |
| 43  | Letty Green     | 8                    | Yes              |
| 44  | Little Hadham   | 13                   | Yes              |
| 45  | Much Hadham     | 52                   | Yes              |
| 46  | Puckeridge      | 86                   | Yes              |
| 47  | Spellbrook      | 7                    | Yes              |

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| No. | Area  | Location Test Figure | Carried forward? |
|-----|---|----------------------|------------------|
| 48  | Standon   | 56                   | Yes              |
| 49  | Stanstead Abbots & St Margarets   | 177                  | Yes              |
| 50  | Stapleford  | 0                    | No               |
| 51  | Tewin   | 31                   | Yes              |
| 52  | Thundridge  | 19                   | Yes              |
| 53  | Tonwell   | 0                    | No               |
| 54  | Wadesmill   | 14                   | Yes              |
| 55  | Walkern   | 51                   | Yes              |
| 56  | Waterford   | 0                    | No               |
| 57  | Watton at Stone   | 87                   | Yes              |
| 58  | Westmill  | 9                    | Yes              |
| 59  | Widford   | 18                   | Yes              |
| 60  | East of Stevenage   | 0                    | No               |
| 61  | East of Welwyn Garden City  | 2000                 | Yes              |
| 62  | North of Harlow – 10,000 split across 62A, 62 and 62B                                     | 10,000               | Yes              |
| 63  | North of Hoddesdon  | 0                    | No               |
| 64  | New settlement - A10 Corridor North   | 0                    | No               |
| 65  | New settlement - A10 Corridor South   | 0                    | No               |
| 66  | New settlement - A120 Corridor  | 0                    | No               |
| 67  | New settlement - A507 Corridor  | 0                    | No               |
| 68  | New settlement - A602 Corridor  | 0                    | No               |
| 69  | New settlement - Hunsdon Area (same area as 62) – geographical options in Area 62A or 62B | 5000                 | Yes              |

- 6.1.8** Options not carried forward will be the subject of the Sustainability Appraisal looking at alternatives to the draft District Plan. Justification of the Council's reasons for rejection of options is provided in Chapter 4: Places. A summary of the reasons was provided with the Report accompanying Chapter 4<sup>(1)</sup>.
- 6.1.9** Further assessment of the remaining areas of search in relation to economic development and urban form was conducted as part of Chapter 5: Options Refinement. Although this work added significantly to understanding of the relative merits and demerits of various options, none were discounted in Chapter 5.

**Figure 6.2 Shortlisted Areas of Search (excluding villages) agreed for further testing, Summer 2012**



1 See District Plan Executive Panel papers (26 July 2012) Agenda Item 9: District Plan Part 1 – Strategy Supporting Document: Chapter 4: Places and Next Steps. Essential Reference Paper C: Chapter 4 Summary [www.eastherts.gov.uk/districtplan](http://www.eastherts.gov.uk/districtplan)

## 6.2 Assessment Methodology

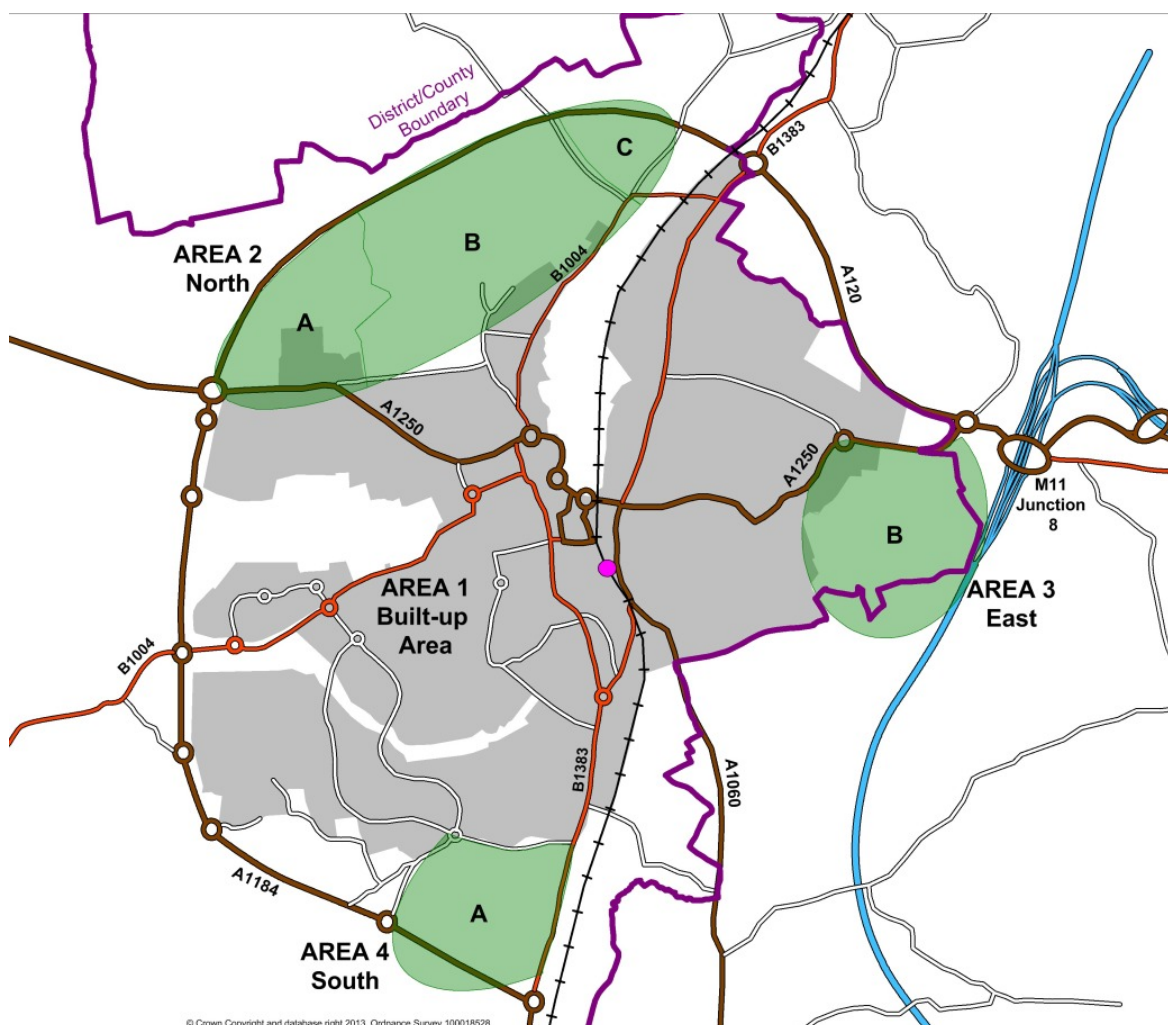
- 6.2.1** The assessment methodology in this final chapter of the Supporting Document draws together the evidence from the process so far and reaches a balanced conclusion. Many different issues have been addressed through the Supporting Document and all the technical studies, feedback and evidence which underlie it.
- 6.2.2** The approach in this chapter is to identify the main issues arising from the evidence base at each of the remaining areas of search. For reasons of clarity other issues are not repeated in this Chapter, but are available elsewhere within the Supporting Document. Broadly, the criteria used to identify the main issues are:
- the role and function of the town
  - opportunities and constraints for future economic and retail development
  - infrastructure ‘showstoppers’ and key areas for further study
  - Green Belt
  - Known delivery opportunities and constraints
- 6.2.3** With regard to the villages, these have all been reconsidered taking account in particular of the size of the settlement and its capacity to accommodate further development. Chapter 6 seeks to refine the work previously undertaken on the villages in order to inform the final strategy.
- 6.2.4** The Supporting Document will form the basis of the local evidence gathering which will form one major component of the development strategy.
- 6.2.5** Sieve 1 and Sieve 2 applied ratings (‘Pass/Marginal Pass/Marginal Fail/Fail’) to each of the original 69 areas of search. Sieve 3 did not apply ratings to each area because of the nuances in the issues. Similarly, Chapter 6 does not apply ratings to the areas, not only because of the nuances in the issues, but also because of the need to avoid premature foreclosure of options based on local evidence alone, as some of the options may be required in order to produce a plan which meets national requirements.
- 6.2.6** The following sections discuss the proposed development strategy of each settlement and each area of search remaining. Each of the settlement strategy sections will be supplemented by proposed settlement policies within the Draft District Plan itself.



## 6.3 Bishop's Stortford

**6.3.1** Assessment to date has demonstrated the important sub-regional role of Bishop's Stortford in comparison with other towns in the district owing to its proximity to the motorway network and Stansted Airport, and its thriving town centre with a good range of shops. The boundaries of the town are generally defined by the A1184/A120 bypass.

**Figure 6.3 Shortlisted Areas of Search for Bishop's Stortford**



**6.3.2** The following sections consider various issues facing the town, providing an up-to-date position on evidence gathered from stakeholders and technical documents.

### Education

**6.3.3** In terms of primary and secondary education, Hertfordshire County has indicated in its submission (September 2013) that if development at all the areas of search around the town were to come forward, this would necessitate provision of an additional 8.5 forms of entry. Because the

existing primary schools are currently all full or nearing capacity, this is likely to require the construction of a number of new primary schools and provision for school sites within site allocations.

- 6.3.4** In terms of a strategy for secondary education, the County Council's submission states that: "Until there is clarity about the outcome of proposed housing development in the north of Bishops Stortford, for which planning applications are currently under consideration by East Herts District Council, it is not considered appropriate to bring forward expansion plans for the latent demand in the town. The developments currently represent the largest development in Hertfordshire and will require new school provision within them to meet the demand generated by them. Any other demand from existing communities will need to be dealt with as required but the options for doing so can only be finalised once proposals for the new development have been settled...With regard to the County Council owned site in Hadham Road, until there is clarity around the expansion potential of the existing schools, Policy BIS7 should be retained."
- 6.3.5** Given the ongoing uncertainty, there is a need for the District Plan to resolve the school sites issue.

### Transport

- 6.3.6** Good access to road and rail networks is a benefit to the town but this brings its own problems because more users create more congestion. Congestion is a particular problem at Hockerill junction, and around Junction 8 of the M11, although it is not confined to these areas. The Bishop's Stortford and Sawbridgeworth Urban Transport Plan (UTP), led by Hertfordshire Council Council, is due to report in 2014, and this is expected to address the main mitigation measures required across the transport network in the study area.
- 6.3.7** Until a definitive position can be reached on whether the residual cumulative impacts of development in Bishop's Stortford would be severe in NPPF terms, this section proceeds on the basis that mitigation measures may be achievable in highways terms for the levels of development discussed.

### Employment and Retail

- 6.3.8** There is potentially a clear economic development strategy for Bishop's Stortford based on its existing economic function. Economically, the town is the most important in East Herts. There is potential to expand the town's employment offer through the provision of a new business park within an urban extension, and through provision of some office or other business accommodation at one or more town centre sites.

**6.3.9** Given local demand, it is not considered that a new business park within an urban extension would undermine the viability of the existing employment areas. For further information see the East Herts Strategic Economic Development Advice (DTZ, 2012) and the Bishop's Stortford Town-Wide Employment Study (DTZ, 2013).

**6.3.10** The town centre offers a greater range of shops and services than other towns in the District including Hertford. It is the only town which offers the potential for an expanded town centre, by integrating the railway station through the Goods Yard and improvements at Station Road bridge. Possible expansions to town centre retail capacity could also occur at Old River Lane and the Mill Site. These opportunities could therefore form part of a retail strategy to complement the economic development strategy. For further information see the East Herts Retail and Town Centres Study (Nathaniel Lichfield and Partners, 2013).

### Character

**6.3.11** The historic core of the town is complemented by attractive Green Wedges including the River Stort. Southern Country Park is an important asset, and there is potential for a new Country Park incorporating Ash Grove and Hoggate's Wood to the north.

**6.3.12** The construction of the Bishop's Stortford's bypass (A1184/A120) established a clear pattern of development by providing readily understandable Green Belt boundaries. This has been a major factor in the recent growth of the town, with developments at St Michael's Mead and Bishop's Park abutting the south-west distributor road and with the designation of the Areas of Special Restraint and the Special Countryside Area to the north of the town.

**6.3.13** The following sections seek to further refine the work previously undertaken on the Bishop's Stortford Areas of Search in order to inform the final strategy.

### Area of Search 1: Built-Up Area

**6.3.14** This area had been anticipated to accommodate around 1,233 dwellings at the end of Chapter 4. This figure was based on relocation of the secondary schools to the Whittington Way site and the consequent availability of the existing school sites at London Road, Warwick Road, Beldams Lane, and Hadham Road to accommodate residential development.

**6.3.15** However, since that time planning permission for the new schools to the south of the town has been dismissed on appeal, and there is ongoing uncertainty as to the future provision of additional schools capacity. Given

that it is now appearing less likely that the schools will relocate, it is considered appropriate to reduce the built-up area dwellings figure by 525 dwellings (Beldams Lane 180, Warwick Road 125, London Road 220).

- 6.3.16** The Hadham Road site is allocated for 250 dwellings in the Local Plan 2007 (Policy BIS2). The Local Plan Inspector 2007 suggested that there is no reason why the site should not come forward for housing, unless it is required for a secondary school. It is therefore proposed to continue the existing status of the Hadham Road site as an allocation for 250 dwellings, but protected by a policy stipulation that this will only come forward if sufficient secondary school capacity is provided elsewhere in the town. This would also reflect Hertfordshire County Council's submission on this matter.
- 6.3.17** At the Goods Yard, the Sieve 1 figure proposed 60 dwellings, taking account of community aspirations expressed in the 2011 Development Brief for a reduction from the Local Plan figure of 492 dwellings and providing for a better mix of uses. However, the developer questionnaire response stated that a range of 200-300 dwellings is considered viable. A figure of 200 dwellings is suggested as an appropriate balance between community aspirations and the developer position on viability. This figure is considered to be achievable in viability terms and will also enable a substantial re-balancing of the mix of development on the site, to provide scope for a substantial increase in non-residential uses.
- 6.3.18** Viability appraisal will be crucial to determination of the delivery of development at the Goods Yard. A policy for the site should require a viability appraisal to assess the figure, taking account of the community aspirations expressed in the 2011 Development Brief. The Bishop's Stortford Town-Wide Employment Study (DTZ, 2013) also drew attention to the viability issues and the need for a viable mix of development, but suggested that a small amount of B1 office space could be supported at the Goods Yard.
- 6.3.19** The impact of traffic congestion arising as a result of this development should be addressed by the traffic modelling carried out by the applicants in support of any planning application. The assessment should also test the highways impact with and without a link road through the site. It is understood that the developers of the Goods Yard are intending to include a multi-storey car park adjacent to the station. Whilst this may assist in the provision of commuter parking and assist in the viability of the development, the Council has concerns about the impact of attracting additional traffic to this site through the Hockerill junction.
- 6.3.20** It is also understood that there is likely market demand from supermarkets or other large retailers for a store at the Goods Yard. However, this would also result in significant amounts of additional car parking and pressure on Hockerill junction and town centre roads, and would be likely to put

pressure on other community aspirations including open space and employment uses. It is therefore suggested that retail should be limited to small-scale, local shops.

- 6.3.21** The Sieve 1 figure did not include dwellings at the Mill Site, because there was no indication of the intention of the occupants of the flour mill to relocate. This remains the case and therefore no figure has been provided at the Mill. However, the Mill Site remains a location of potential strategic importance to the town, and therefore a site-specific planning policy based around the aspirations contained in the July 2011 Development Brief is appropriate. This policy would apply in the event that the flour mill owners wished to relocate during the plan period.
- 6.3.22** Commitments amount to 207 dwellings as of March 2013, including 48 at small sites, and 159 on allocated or large sites. This includes 97 dwellings with outline permission at Old River Lane. There are 247 dwellings at SLAA sites within the town.
- 6.3.23** The revised figure for Area of Search 1 therefore is 904 dwellings (Hadham Road 250, Goods Yard 200, SLAA 247, commitments 207).

### **Area of Search 2: Bishop's Stortford North**

- 6.3.24** In the Local Plan 2007 this area is inset from the Green Belt but outside the settlement area. It has been designated as safeguarded land for future development, since the late 1980s. Applications for outline permission for urban extensions for 2,600 dwellings have been received by the Council.
- 6.3.25** As noted above, Bishop's Stortford is the most attractive location in the District for economic development. Bishop's Stortford North provides the potential for a new B1 business park of 5-6 hectares, with direct access off a new roundabout at the A120 and onto the M11. This would be in addition to the small-scale employment opportunities proposed by the applicants within the two neighbourhood centres.
- 6.3.26** Hertfordshire County Council's Transport Briefing Note is supplemented by its response to the planning applications. The County Council's recommendation is that permission be granted with conditions . According to the submission, the County Council has lifted its objection to a direct access/new roundabout onto the A120, and that with the proposed mitigation measures the impacts on the A120 are likely to be acceptable. However, it does state that in order to combat increase in traffic congestion improved bus services and other sustainable transport initiatives will be needed, to encourage a change in travel behaviour.



- 6.3.27** Essex County Council has also recently completed a Local Plan Highway Impact Assessment (October 2013). This raises concerns about the impacts of growth on roads in the vicinity of Junction 8 of the M11. However, it is understood that these concerns may be allayed by the provision of appropriate mitigation measures. This will need further assessment.
- 6.3.28** The environmental impacts of development north of Bishop's Stortford may be adequately mitigated in planning terms. Locally, the Green Wedge, maintaining its existing Green Belt status, will preserve the features of Ash Grove and Hoggate's Wood. A suitable Green Infrastructure framework may retain and emphasise the woodland and hedgerows, and provide a suitable sustainable drainage strategy.
- 6.3.29** In terms of the overall level of development, the area was originally proposed for 2,500 dwellings, including 700 in Sub-Area A West of Hoggate's Wood, 1,400 in Sub-Area B between Hoggate's Wood and Farnham Road. The applicants for ASR1-4 have stated that in light of their masterplanning work submitted with the planning application this figure should be reviewed. There are no apparent grounds to disagree with this request. It is therefore proposed that the figure for Sub-Area B be revised to 1,500 dwellings, making the overall figure for Bishop's Stortford North 2,600 dwellings. It should also be noted however, that should a new secondary school be required at Bishop's Stortford North, this would require a reduction in the amount of housing provided.

### **Area of Search 3: East (sub-area B only)**

- 6.3.30** The land is owned by the Golf Club, working with a housing developer. Responding to the questionnaire in summer 2012, the developer explained that there are two proposed sites: Manor Links and the Practise Ground site. The developer submission confirms that a figure of around 150 dwellings is achievable early in the plan period. The developer submission addressed the issue of vehicular access and the Council is not aware of any reasons to doubt the information supplied.
- 6.3.31** Although Greenfield land, there are no known immediate environmental or other constraints, although detailed assessment would need to be carried out to support any future planning application, taking account of nearby locally designated wildlife sites.
- 6.3.32** The Transport Briefing Note (November 2013) indicates little impact on the highway network arising from this proposal.
- 6.3.33** The Green Belt review indicates weak potential boundaries around the area in question. It points to the Golf Course to the west providing a buffer with Stansted Airport and the lack of countryside features. Therefore,

although different from Bishop's Stortford North and South in terms of boundary features, Green Belt release here could be justified by the exceptional circumstances of housing need.

- 6.3.34** The area is insufficiently large to host significant infrastructure such as schools, and therefore additional capacity would need to be found off-site at other locations within the town. The size of the area also means that it offers no potential for an employment area or neighbourhood centre. However, local infrastructure such as play areas and amenity space should be accommodated.

### Area of Search 4: South (sub-area A only)

- 6.3.35** Chapter 4 set out the basis for this figure. The total area is around 50 hectares, but around 17 hectares would be needed if a secondary school were provided, leaving 33 hectares. Multiplied by 25 dwellings per hectare, that would yield 1,250 dwellings for the whole area, or 825 for 33 hectares. This lower figure was rounded to 800 dwellings in Chapter 4.
- 6.3.36** ATLAS followed up the capacity issues with the developers. This broadly confirms a range of figures between 800 and 1,300 dwellings, although the developers point out that this is only a starting point, and a final figure could only be derived through a masterplanning exercise. In response to a question from ATLAS, the developers stated that they are comfortable with simultaneous development to the north and south. There is no evidence to suggest that the local property market would not support the level of demand necessary to build at these levels.
- 6.3.37** Uncertainty about the location of a future secondary school within the town would necessitate a flexible approach to any planning framework for this area. Should it not be possible to meet secondary school capacity requirements at either Hadham Road or at Bishop's Stortford North, then this area could provide a secondary school to address existing deficits as well as to provide for new development. However, it may be that the issues are not resolved and therefore, should this area come forward, a policy would need to provide the flexibility to accommodate alternative development mixes at the location whilst ensuring that local control is retained.
- 6.3.38** The Council rejected the proposals for a secondary school at this location within the context of the Local Plan 2007. The Planning Inspector and Secretary of State agreed that Hertfordshire County Council had not sufficiently explored alternative options for school expansion to justify the very special circumstances to allow development to take place in the Green Belt.

- 6.3.39** In terms of Green Belt purposes, the Green Belt Review (2013) recommends that the area should not be released because it serves an important role in safeguarding countryside from encroachment. In terms of boundaries, the only potential strong boundaries, were the site to be released, would be at St. James' Way/A1184 and London Road.
- 6.3.40** The Transport Briefing Note sets out the main considerations for the site. Based on the transport modelling undertaken, it appears that this scale of development in the area could require significant upgrades to the A120 bypass. The developers have stated that their transport consultants have considered the issues of traffic generation associated with housing development or a mix of school plus housing (see response to ATLAS). This work would need to be subject to further scrutiny if this area were to be brought forward as part of the District Plan.
- 6.3.41** In terms of employment potential, the Bishop's Stortford Town-Wide Employment Study suggests that, although less attractive than other options such as at Bishop's Stortford North due to greater distance from the M11 along the A120/A1184 bypass, this area could nevertheless be a viable location for a local business park as part of a mixed-use scheme. This scale of development would also warrant the inclusion of a neighbourhood centre containing local shops and facilities.
- 6.3.42** Given the need to maintain flexibility, and the uncertainty about the requirement for and scale of a neighbourhood centre, secondary school, and employment area, a revised figure of 1,000 dwellings is proposed. However, this may need to be reduced if a secondary school is required.

### Conclusions and Next Steps

- 6.3.43** From the work undertaken through the Supporting Document, the basis for a suitable development strategy for Bishop's Stortford is relatively clear, given its advantages in terms of retail and town centre expansion capacity, employment potential given its proximity to the M11 and the airport, and the boundary line of the A120/A1184. These factors provide the framework for a development strategy.
- 6.3.44** Identified development options of 3,750 dwellings (2,600 + 150 + 1,000), as detailed above, in addition to urban capacity and known commitments (904) would total 4,654 dwellings. It is expected that windfall developments will also occur within the Plan period, which would increase this total. Whether all of these options will be required will be the subject of the Strategy Report.
- 6.3.45** Hertfordshire County Council's advice in relation to transport indicates that there are no apparent 'showstopper' issues at present. However, further testing and assessing will be needed once a draft District Plan has been



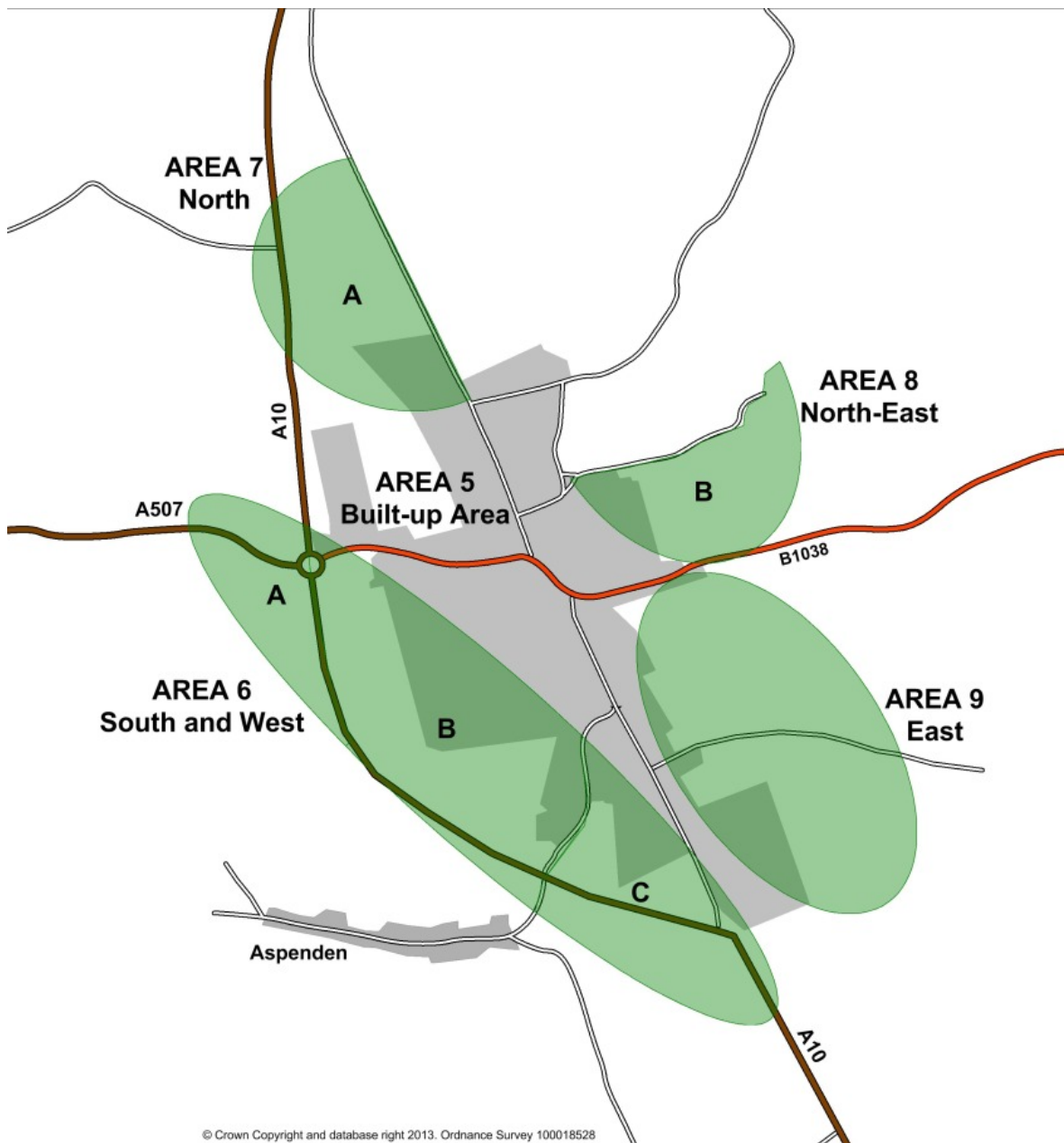
published for consultation, prior to examination in public. The strategy for the town will need to provide flexibility to enable the secondary schools issue to be resolved and a viable school site identified.

- 6.3.46** The Bishop's Stortford and Sawbridgeworth Urban Transport Plan (UTP) will follow publication of the draft District Plan, and will provide further evidence in respect of possible mitigation measures to address the cumulative impacts of development. It will look at the cumulative impact of traffic entering the town from Hertfordshire and Essex; and it will further assess the options for Park and Ride facilities for the town, taking account of planned development at sites across the area and beyond. Working with East Herts Council's Environmental Health department, and taking account of transport modelling and transport mitigation measures, the UTP will also address the issue of air quality at the Hockerill Air Quality Management Area.
- 6.3.47** Finally, the District Plan will need to provide a framework for a strategy for the provision of secondary education in the town. This will need to take account of the available options. Given the ongoing uncertainty, the Local Planning Authority needs to provide flexibility and avoid prematurely closing off potential solutions. The options remaining through the District Plan process are in potential urban extensions to the north and south of the town, and at Hadham Road.

## 6.4 Buntingford

**6.4.1** Buntingford plays a vital role as a small market town and rural service centre serving both the town and an extensive rural hinterland. Buntingford is unusual in the East Herts context, in that it is not located close to other towns, does not benefit from a train station and is not surrounded by Green Belt.

**Figure 6.4 Shortlisted Areas of Search for Buntingford**



**6.4.2** The following sections consider various issues facing the town, providing an up-to-date position on evidence gathered from stakeholders and technical documents.

### Education

- 6.4.3** Buntingford has a three-tier education system with a mixture of first, primary and middle schools for primary aged children, with middle schools and upper schools providing for secondary aged children. There is some current and potential additional capacity available in the first school tier. However, there are issues over the capacity of provision at middle and upper level. Forecasts indicate a shortfall in capacity at middle and upper levels, but part of this could be addressed by changing intake catchments, such as reducing intake from Stevenage and Royston. Future growth of the town will require additional provision across all tiers of education within Buntingford.
- 6.4.4** At primary level, if Layston First School expanded by one form of entry (1FE) and Millfield First School expanded by 0.5FE this would equate to approximately 750 new dwellings in the town. This would depend upon the provision of new buildings within the existing land at Layston School, and the provision of new buildings and playing fields. This would require the land adjacent to the school to be allocated for school use in the District Plan or the use of a detached playing field, which for primary school children is not the preferred situation.
- 6.4.5** Current analysis of pupils attending the middle schools confirms that around 1FE of pupils in each year group live in either Royston or Stevenage school planning areas and the Royston/Stevenage schools are their closest.
- 6.4.6** At middle level, Edwinstree Middle School has the potential to expand by 1.3FE, which equates to 650 dwellings. However, there is a current deficit of 0.5FE, which equates to approximately 250 dwellings. If the school were to expand by 1.3 forms to a full 5FE school this would only leave in theory, a 'spare capacity' of 400 dwellings. The expansion of Edwinstree School would however, require major improvements to the school; through new buildings, the use of adjacent playing fields and/or an all-weather pitch/MUGA, a new/improved access and 'park and stride' facility. If the 1FE of pupils from other towns were discounted, there would be a current 'spare capacity' of 0.5FE, which would equate to 250 dwellings before expansion in the form of new buildings is required.
- 6.4.7** Also at middle level, the Ralph Sadlier Middle School, in nearby Puckeridge is included within the Buntingford School Planning Area. Whilst it is not ideal to transport a large number of children out of the town to attend middle school, there is the potential for Ralph Sadlier School to expand by two forms of entry which could accommodate approximately 1,000 dwellings. In order to expand the school, new buildings would be required plus highway improvements.

- 6.4.8** At upper level, Freman College has a current deficit of 2FE. However, this shortfall is due to the current admissions policy which accepts pupils from Stevenage and Royston, where there is current and forecast capacity. An analysis of historic inflows confirms an average of 2FE of pupils flow into Buntingford from other areas for a place at Freman College. Whilst many of these pupils currently attend the feeder middle schools, if the local pupil numbers in Buntingford and Puckeridge were to increase, these schools would draw from an ever decreasing catchment area because they both allocate (currently) in accordance with Hertfordshire County Council's admissions rules i.e. those who live nearest to the school. There will however, be ongoing sibling connections for a number of years.
- 6.4.9** With future allocations to middle and upper schools in Buntingford likely to be dependent upon the level of demand from the local community, analysis of current pre-school aged children suggests there are sufficient current places available in the first and middle schools to enable this trend to continue. There are also sufficient places available in Stevenage and Royston to cater for those pupils who live in these areas who may not gain a Buntingford school place in later years. Growth beyond the emerging Plan period will require significant improvements to all educational facilities in the town.

### Transport

- 6.4.10** Information received from the Highway Authority, Hertfordshire County Council, explains how assessments on highway infrastructure in the town have been undertaken. Buntingford is beyond the modelling area for the majority of models undertaken throughout the district, and there are limitations to their assessments as a result of the uncertainty surrounding the delivery of an A120 bypass around Little Hadham. A Little Hadham bypass could help to alleviate movements around Buntingford to the east of the town, but during any construction phase, there could be major impacts on roads through the town on an east-west direction.
- 6.4.11** Diamond Modelling undertaken indicates that development of around 500 dwellings could be accommodated within the existing highway network, with some local improvements required to ease the flow of some junctions. The use of local roads as means of access was suggested in preference to new access from the A10. Diamond Modelling undertaken for the Harlow Stansted Gateway Transport Area included scenarios that tested 1,500 and 2,000 dwellings in the Buntingford area. The Highway Authority have stated that further work will be required to determine the possible impacts of this higher level of development, mitigation measures will need to be considered and a masterplan approach used to determine and manage impacts.

- 6.4.12** In terms of the passenger transport network, as has already been mentioned, Buntingford does not have a railway line or station and is highly dependent upon private vehicles. There are some bus routes through the town to neighbouring settlements, though these routes would not serve development to the north of the town. Development in the town would make these services more viable but it is unlikely to justify new or altered routes.

### Other Infrastructure

- 6.4.13** Buntingford is served by a sewerage treatment works to the south of the town, which functions on a gravity- fed system. Correspondence with Thames Water indicates that any development outside the current built-up area will require new connections to the treatment works and an upgrade to the works themselves.
- 6.4.14** In terms of sewage treatment, Buntingford Sewage Treatment Works (STW) has seen a reduction in foul flows in recent years but these have now started to increase again as a result of some small housing developments being completed. Some spare capacity exists for further development to commence. However, an upgrade to the STW will be required to cater for flows from all the developments proposed. The extent of the upgrades cannot, at this time be detailed but Thames Water are carrying out investigations and modelling work to enable the upgrades to be scoped. All developments in the area will therefore need to contribute towards future upgrade works.
- 6.4.15** In terms of Sewerage Network, Thames Water are undertaking scenario planning to identify the extent of capacity deficiencies that may exist and possible solutions that may be needed as a result of potential development. A hydraulic model of the catchment is to be built and work on this has recently commenced. It is acknowledged that to upgrade the sewers within the main High Street would be disruptive to the community and this will be avoided if at all possible. Depending on the exact location of any chosen development site, new connections directly to the STW following the line of the bypass are most likely. Alternative options could be to provide local tank sewers to balance the flows.

### Employment and Retail

- 6.4.16** Buntingford has four employment areas of which three are operational. The findings of the 2012 revised employment study indicate the need to retain designated employment land in Buntingford because it provides a valuable local resource for businesses serving the town and the wider rural area, and is a valuable source of local employment. Investment in these employment areas would help to ensure premises are fit for purpose.

- 6.4.17** As a smaller centre, Buntingford provides essential services and convenience goods shopping to its catchment population, but has a limited comparison shopping offer. Much expenditure available in the town is spent in neighbouring larger towns. There are two small supermarkets but the majority of units in the High Street are small independent stores, which following a historic market town characteristic, are residential properties with a retail unit on the ground floor. As such, there is limited capacity to expand or alter the town centre unless there is a considerable change in this market town character.

### Character

- 6.4.18** The town runs along a north-south axis within the valley of the River Rib, following the Roman Ermine Street corridor. Its river valley setting means that some parts of the town are subject to the risk of flooding from the river. Within the 20th Century, development spread eastwards and westwards up the valley sides. There are few designated environmental assets around the town but there are many historic assets throughout the town including a Conservation Area that covers much of the northern half of the town and one which covers the nearby village of Aspenden.
- 6.4.19** Despite its rural setting, Buntingford has a lack of accessible natural green space (ANG) and open space, including woodland and space for children and young people. The East Herts Green Infrastructure Plan (GIP) suggests that this should be alleviated through creating better public access to the countryside resource that surrounds the settlement. There is a lack of cycle routes and rights of way to the north and south east of the settlement. The GIP suggests that if growth was considered to the settlement edge, rights of way / green corridors should be created to ensure these new homes have sustainable access. ANG and open space for children and young people will also need to be provided alongside any new residential areas. There is also a need to ensure that needs for indoor sports facilities are met through new developments.
- 6.4.20** The following sections seek to further refine the work previously undertaken on the Buntingford Areas of Search in order to inform the final strategy.

### Area of Search 5: Built-Up Area

- 6.4.21** At the end of Chapter 4, it was estimated that the built-up area of Buntingford would yield approximately 67 dwellings on identified SLAA sites and on other sites with permissions. This figure has been updated since with identified SLAA sites, as of March 2013 potentially yielding an estimated 13 dwellings, which along with other permissions yielding 148 dwellings would total 161 dwellings. There have been a number of completions since then, with the latest position as of November 2013 being 13 dwellings at SLAA sites, and 34 commitments, totalling 47.



- 6.4.22** The former Sainsbury's distribution depot land was discounted in Chapter 4 as there was an application to redevelop the depot for continued employment use as a new distribution centre. The application was approved and it was assumed the land would be put back to employment use. However, soon after permission was granted there was a change in ownership to a house-builder, who has submitted an application for a residential-led scheme of 328 dwellings with some small business units and a 65 bed care home. The principle of development is already established on the former distribution depot land. It is a previously developed site within the defined town boundary, and therefore, the principle of development is considered acceptable.
- 6.4.23** It was previously estimated that the site would contain approximately 10 hectares of developable land, which at 25 dwellings per hectare would yield 250 dwellings. The submitted scheme has a developable area of 8.75ha, which with 328 proposed dwellings would equal a density of 37dph. A compromise of 300 dwellings is therefore considered a reasonable level of development.
- 6.4.24** Access to the site is very good, with almost direct access to the A10/London Road junction. However, the site is further away from the town centre than other locations under consideration, though a bus route runs along London Road to Baldock Road. The Chapter 4 assessment rated the site as having a good access to bus services, but connections to nearby rail services are relatively poor, as is the case for the town as a whole.
- 6.4.25** It is essential that all developments contribute towards the provision of necessary infrastructure. Indications are that this level of development could be accommodated within the existing education infrastructure, and improvements could be made to the waste water treatment facility and connections to it from within the built-up area.
- 6.4.26** Small sites and permissions are set out in the housing trajectory in the latest Annual Monitoring Report. However, it is anticipated that further windfall opportunities are likely to become available in the urban area during the Plan period.

### **Area of Search 6a: Buntingford South and West:**

- 6.4.27** This area of search to the west of the A10 was discounted at the end of Chapter 4 as being unsuitable for residential development for a number of reasons. However, the location to the north of the existing Buntingford Business Park makes an ideal location for future employment uses. As such, an area of 3 hectares is proposed to be allocated in the District Plan for employment uses.

### **Area of Search 6b: Buntingford South and West**

- 6.4.28** At the end of Chapter 4, this area scored a 'marginal pass', as there are a number of issues that would need to be resolved in order to facilitate development. The A10 acts as a clear western boundary to development. On a map, this area seems the obvious location for infilling. However, there are a number of physical constraints which would limit and dictate development within this gap, not least the requirement to provide a buffer between new development and the A10, the sewage treatment works and Watermill Industrial Estate.
- 6.4.29** Access is also a considerable barrier. The existing residential service roads have a threshold of 300 dwellings before they reach capacity. Luynes Rise currently serves over 200 properties plus a community centre. Monks Walk currently serves 350 properties (with two points of access). Development in this area would require several points of access, however, two potential access points to the north of the site have been prejudiced by recent planning permissions, existing estate roads are close to or over capacity, and access from the A10 bypass would not normally be acceptable to the Highway Authority.
- 6.4.30** Information submitted by the land promoter to the Call for Sites process suggests that access from the A10 could be achieved to serve a development of approximately 500 dwellings, which would include land at Aspenden Bridge (currently subject to an application for 56 dwellings). Access would only be by a single point of access from the A10 with a possible link road to the south of the site past the sewage works. As such, there would be few links to the existing built fabric of the town, with residents of this estate effectively bypassing the town itself rather than being an integrated element. Information from the Highway Authority suggests that access directly from the A10 would not be supported in any location to the west of Buntingford.
- 6.4.31** Given these access issues and the requirement to build a new sewer to serve the development, taken in combination with other options around the town, this area would be considered the least suitable location and should therefore not be an option for development within this Plan period.

### **Area of Search 7: North (sub-area A only)**

- 6.4.32** At the end of Chapter 4, development to the north of the town was considered a reasonable option for development provided that issues such as education and waste water infrastructure could be resolved. Development to the north would need to ensure there is a satisfactory relationship between the adjoining education and employment uses. There is a long-standing desire to provide improvements to the access to Freman College, along with enlarged playing fields, which would facilitate the expansion of the built-up part of the school grounds. Both these issues could both be resolved as part of a wider plan for development to the north of the town.



- 6.4.33** Based on an initial assumption, it was estimated that the site could yield approximately 10 hectares of developable land which would yield 250 dwellings at 25dph. There is a current application for this site (September 2013) for 180 dwellings with a care home and potential 'country hotel' at a later date. The application would provide a new link road to access Freman College, as well as provide a large area of land for playing pitches for the college. The scheme includes a care home and sheltered houses. As such, there are several benefits associated with the proposed scheme that could benefit the town as a whole. The landscape to the north of the town is considered valuable as a barrier and transition between urban and rural and in preserving the local distinctiveness of the Corneybury grounds. A balanced judgement will be necessary to determine whether the potential benefits that could be realised from the site outweigh the potential impacts on a sensitive landscape which is a key part of the character of Buntingford.
- 6.4.34** Information received from Thames Water suggests that new waste water networks would be difficult to achieve from development in this location. A gravity-fed system would be needed which, if following the most direct route, would involve digging up the High Street to upgrade existing networks. An alternative, but more costly solution would require a new pumping station and a new sewer which would run alongside the A10 bypass. Such a scheme would be more deliverable if land within the bypass was also developed as there would be two developer contributions to help facilitate the works required.
- 6.4.35** Development in this location will need to ensure that there is an appropriate transition between the existing urban area and the wider countryside to the north of the town and the important historic landscape of Corneybury to the east of Ermine Street. Given these constraints and the need to provide other land uses the figure of 180 dwellings is considered an appropriate number of dwellings to the north of the town.

### **Area of Search 8: North-East (sub-area B only)**

- 6.4.36** Land to the north-east of Buntingford to the north of Hare Street Road was, at the end of Chapter 4 considered a reasonable option for development, gaining a 'marginal pass' for up to 300 dwellings. An application was subsequently submitted on land to the north of Hare Street Road for 160 dwellings a cemetery and allotments. This application was refused and is currently subject to appeal, being considered in a joint inquiry with a site to the south of Hare Street Road (see Area 9) scheduled for December 2013.
- 6.4.37** There are potential impacts on the landscape from development in this location as it is extending up the valley sides. There is a clear boundary to development in the form of a tree belt, however, the proposed

development extends beyond this boundary through the creation of the cemetery and allotments to the east of the tree belt into land where there is no clear boundary to development.

- 6.4.38** Being adjacent to Layston First School this land is ideally located to provide for the expansion of the school. Although there is capacity in the short to medium term within the two primary schools, it is expected that they will need to expand towards the end of the Plan period to accommodate future growth of the town. To prejudice this ability of the school to expand in the future would be short-sighted and could cause future capacity issues. Development in this location should therefore set aside land for the future use by the school.
- 6.4.39** Given the lack of open spaces and play areas in the town, development should also ensure a suitable provision of recreational land within the development. These two land use constraints combined would reduce the developable area of the land within the tree belt to less than 5 hectares, which would comfortably accommodate 125 dwellings at 25dph. However, the proposal is for 160 dwellings with a small amount of land set aside for the school.
- 6.4.40** As this proposal is subject to appeal and may, therefore, receive permission before the District Plan is adopted, it is necessary to ensure the infrastructure implications of the development, in conjunction with the other likely developments around the town, are resolved through the strategic planning function of the District Plan.

### **Area of Search 9: East (sub-area A only)**

- 6.4.41** At the end of Chapter 4, this area of search was given a ‘marginal pass’ rating for up to 500 dwellings. Further work refined this number down to approximately 450 dwellings within the 18 hectares of land to the south of Hare Street Road and north of Owles Lane, defined by a newly planted tree belt, which would form a logical eastern boundary to development. As the land rises to the south-east towards Owles Lane, development which extends up this valley slope would be fairly visually prominent. Owles Lane is a very narrow access road which would be unsuitable to use to access any major development. As such, development in this area would only be served from Hare Street Road or existing residential culs-de-sac, which will have a limit to the amount of development they can serve.
- 6.4.42** If considered in isolation, this land could accommodate this scale of development, being served by several access points in a form which despite rising up the valley sides could be designed to integrate well with the existing urban form. A development of this scale could in isolation be accommodated within existing schools. However, this scale of development alongside the other proposed developments around the town would require at least 1FE expansions at all three education levels. This site alone could

however, meet more than the identified housing need for the town and its rural hinterland, but would not deliver many of the benefits that could be realised with the other developments. The cumulative impacts of such a scale of development in conjunction with other sites around the town would need further assessment.

- 6.4.43** Despite owning the whole of this land, developers have submitted an application for 100 dwellings accessed only from Snells Mead. The Council refused this application and it is now subject to a joint planning inquiry with the land to the north of Hare Street Road, scheduled for December 2013. Although the application is in outline form only, the potential layout of the proposal would prejudice future development in this location. As this proposal is subject to appeal and may, therefore, receive permission before the District Plan is adopted, it is necessary to ensure the infrastructure implications of the development, in conjunction with the other likely developments around the town, are resolved through the strategic planning function of the District Plan.

### Other Development Sites

- 6.4.44** In addition to the above, there are several sites around the town subject to planning applications. There is an outline application pending a decision to the south of the town on land known as Aspenden Bridge for approximately 56 dwellings, which would be linked to land to the west of the town (area of search 6b). There are also a number of extant permissions and sites identified as part of the Strategic Land Availability Assessment, totalling approximately 75 dwellings, expected to be delivered within the pre-plan period (between 2011 and 2016).

### Conclusion and Next Steps

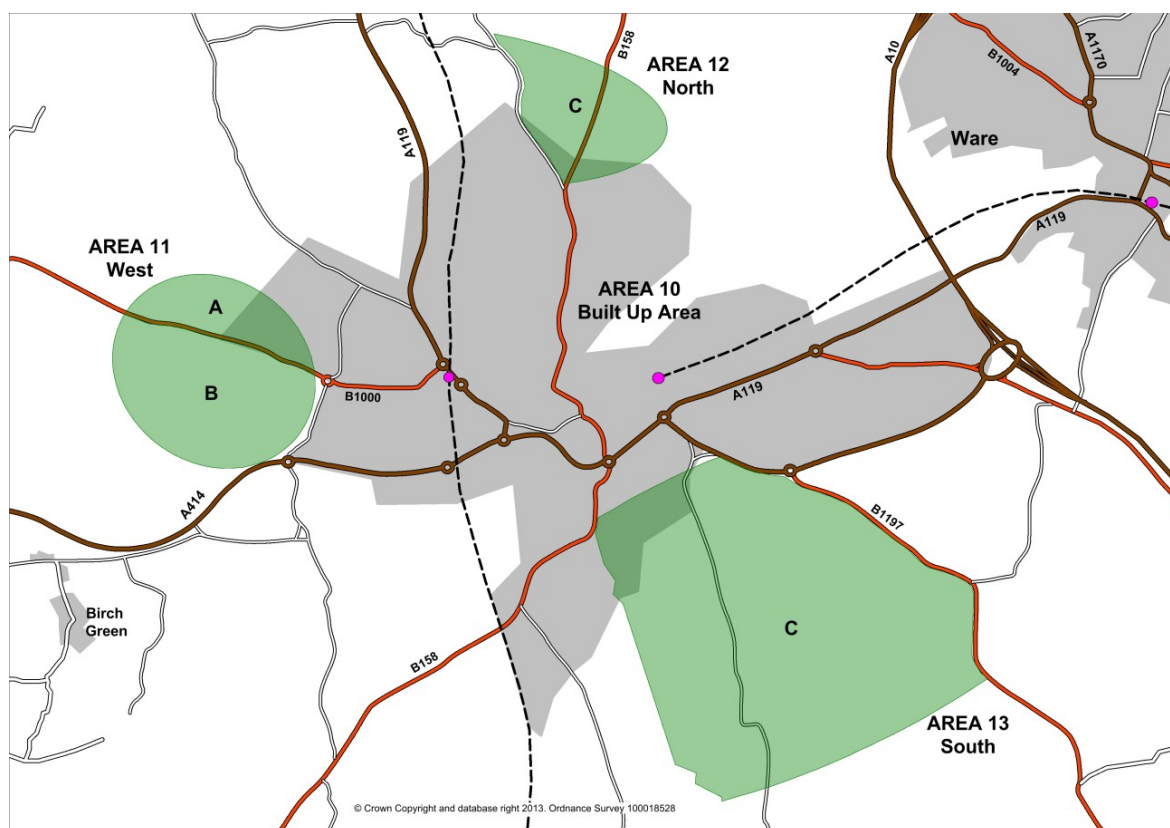
- 6.4.45** In an ideal situation, all the potential development sites around the town would be considered through the process of preparing the District Plan, where the cumulative impacts of development can be properly assessed and the necessary infrastructure planned for. Site-specific policies can be designed to ensure the delivery of necessary infrastructure, not just for each site, but for the whole town. However, because there are current applications yet to be determined and others already refused and subject to the appeal process, all made in advance of the District Plan, this makes it difficult to ensure that the cumulative impacts of development are appropriately assessed and the necessary supporting infrastructure is provided. Each development on its own would not trigger the need for major infrastructure, and as such will be determined by the Planning Inspectorate on this basis. However, through the process of preparing a strategy for the growth of the town there are issues over the cumulative impacts of development that may now not be managed appropriately.

- 6.4.46** It is important to consider when planning for Buntingford as a smaller town that it would not be ideal to have simultaneous developments being constructed at once. Many dwellings being built at once would create much needed competition and may help in bringing sale prices down if two or more developers compete for the same market. However, if sale prices fall developers could slow down or even halt delivery if the scheme becomes less viable. A reduction in viability could result in developers seeking to reduce much needed contributions towards community and utility infrastructure. It could even result in schemes being put on hold altogether while a developer waits for a better position in the local market.
- 6.4.47** Another element of constructing too many homes too quickly could be the loss of these homes to the local housing market, i.e. it may result in more properties being bought by people from outside the town, thereby not addressing the longer term needs of Buntingford itself. It is therefore essential that the phasing of delivery is given careful consideration.
- 6.4.48** Similarly, local school place provision should be designed in line with increased local demand. For example, if more school places are created now, they will be occupied by children from nearby towns, reducing the available capacity for local children when they require places.
- 6.4.49** On balance, acknowledging the brownfield nature of the former Sainsbury's Depot site, and the greater and wider potential town-wide benefits which could be released and delivered by development to the north of the town, it is considered that these two sites should be identified as the Council's preferred development locations for inclusion in the District Plan. However, the Inspector's decisions on the two appeals to the east of the town may necessitate a review of these preferences, in order to appropriately contain and manage the scale, timing and delivery of development and its supporting infrastructure in Buntingford, in a manner that is proportionate to its size and projected housing need.

## 6.5 Hertford

**6.5.1** To date, assessment has demonstrated that Hertford plays a key role as a market town and rural service centre which serves both the town itself and an extensive rural hinterland. The boundaries of the town are generally not that clearly defined, and this has been confirmed through the Green Belt Review 2013.

**Figure 6.5 Shortlisted Areas of Search for Hertford**



**6.5.2** The following sections consider various issues facing the town, providing an up-to-date position on evidence gathered from stakeholders and technical documents.

### Education

**6.5.3** In terms of education, development in Hertford and the remaining Areas of Search would generate the requirement for additional school places. Hertfordshire County Council has identified a need for the provision of an additional two forms of entry at primary level in Hertford to cover the plan period. Current investigations are centred on potential provision of these within the grounds of Simon Balle Secondary School but, if this scheme should not come to fruition, would need resolving elsewhere.

**6.5.4** With regard to secondary provision, Hertford forms part of the combined Hertford and Ware Schools Planning Area. Largely due to single sex provision of Richard Hale (boys) in Hertford and Presdales (girls) in Ware, a significant number of pupils cross-travel between the two towns to access their schools. As such, Hertfordshire County Council is in the process of carrying out feasibility work on the expansion of existing secondary schools within the planning area. However, given the level of development under consideration for both towns, and the need to satisfy a short-fall of places in the short-term, it is unlikely that expansion of existing schools will meet demand. The provision of a new secondary school is therefore likely to be required within the plan period to meet the needs of the two towns.

**6.5.5** The educational issues raised above are generic to all potential development locations for Hertford and are therefore not discussed in any further detail below.

### Transport

**6.5.6** Hertford benefits from good rail connections, with stations serving two different lines into London and wider locations, and is also home to a bus station providing access to a multitude of destinations near and far.

**6.5.7** While its road connections are good, they suffer from congestion, especially at peak times. This is particularly true of the A414 which runs through the town and where a study led by HCC as Highway Authority is currently on-going to identify and assess possible measures to help ameliorate increased traffic movements caused by potential development both within and beyond the district boundaries. In the absence of the finalisation of this report (due to conclude in February 2014) and a definitive position on whether the residual cumulative impacts of development in Hertford would be severe in NPPF terms, this section proceeds on the basis that mitigating measures may be achievable in highways terms for the levels of delivery discussed.

### Other Infrastructure

**6.5.8** In terms of waste water issues, correspondence with Thames Water has indicated that there are capacity issues in locations to the north and south of the town that could have knock-on effects in existing locations and therefore may constrain development opportunities.

### Employment and Retail

**6.5.9** In respect of employment provision, beyond those locations previously identified for redevelopment for mixed use by the Council in the Mead Lane area, the findings of the 2012 Employment Forecasts and Strategic Economic Development Advice Report indicate the need to protect existing designated sites, albeit that some areas may require rejuvenation. It was



also recommended that consideration be given to identifying a small number of modest sites for new B1 employment in the Hertford and Ware area. However, in considering new allocations, due consideration should be given to the impact on existing employment sites.

- 6.5.10** For future retail provision, Hertford's constrained development pattern limits the potential to expand within the central core and to improve upon its secondary town centre status. The 2013 Retail and Town Centres Update Report recognises the limited prospects that Hertford would have to expand its retail role within the town centre and suggests that "release of edge of centre employment land for retail use could be considered" in the longer term to meet future demand, "for example the remainder of the McMullen's Brewery site". However, any such proposal would need to be balanced against the need for the continued use of employment land, as discussed above.

### Character

- 6.5.11** Hertford's town boundaries are characterised by its four 'Green Fingers', which are areas of open undeveloped land that penetrate towards the centre of the town and are bounded on each side by radiating urban development. The Green Fingers are a valued environmental asset providing access to open space in the town and the surrounding countryside.
- 6.5.12** To the west of the town, Panshanger features the remains of an 18th and 19th century landscape park covering about 350 hectares and includes parkland, woodland and agricultural land. Following gravel extraction, the site is to be used as a country park under the Panshanger Country Park initiative which aims to improve public access and provide links towards Welwyn Garden City. Any future development to the west of the town should support this scheme.
- 6.5.13** Despite the apparent availability of open space, the 2011 East Herts Green Infrastructure Plan has identified a deficit in Accessible Natural Greenspace and sites offering space for children. Deficiencies in off-road links between the urban area and the surrounding countryside and the need to improve links between Hertford and Ware have also been highlighted in this report.
- 6.5.14** The following sections seek to further refine the work previously undertaken on the Hertford Areas of Search in order to inform the final strategy.

### Area of Search 10: Hertford Built-Up Area

- 6.5.15** This area had been anticipated to accommodate around 875 dwellings at the end of Chapter 4. Further refinement has indicated that a figure of around 896 dwellings (including both urban capacity and existing commitments) could be delivered during the plan period.

- 6.5.16** The major element of the uncommitted development in the built-up area during the plan period is anticipated to be provided in the Mead Lane area (300) with the remaining dwellings forming smaller pockets within other parts of the built-up area of the town. The draft Mead Lane Urban Design Framework (UDF) sets the context for the regeneration of that area and, in respect of transport impediments, builds on the potential solutions that were first identified in the Hertford and Ware Urban Transport Plan. However, it is recognised that, even following the implementation of the sustainable travel initiatives encouraged in the UDF, traffic generation from the area will undoubtedly have some impact on the wider road network.
- 6.5.17** In terms of any changes to employment provision beyond those proposed in the Mead Lane area (mixed-use), given the concentration of Council offices and Police station in the Pegs Lane/Hale Road area, coupled with the existing employment facilities fronting the A414 Gascoyne Way, it is considered appropriate that a new employment area be designated in this location. As such, an area of 9.29 hectares is proposed to be allocated in the District Plan for employment, sui generis and mixed uses.
- 6.5.18** Small sites and permissions are set out in the housing trajectory in the latest Annual Monitoring Report; however, it is anticipated that further windfall opportunities are likely to become available in the urban area during the plan period.

### **Area of Search 11: Hertford West**

- 6.5.19** The assessment process up to the end of Chapter 4 had envisaged development of around 600 dwellings to be evenly split between the two sub-areas. On the basis of information received to date for Sub-Area A it is envisaged that the previously mooted number of 300 dwellings could be achieved in this location.
- 6.5.20** However, the return of the developer questionnaires resulted in an adjustment of the capacity of Sub-Area B from 300 to 250 dwellings based on the promoters' assessment of the site taking into account various matters which include, inter alia, the protection of the wildlife site.
- 6.5.21** As there are not considered to be any major impediments to the delivery of 550 dwellings in the total search area, it is likely that delivery would occur early in the Plan period. The promoters of the sites concur with this view. The area is well located to access the town's existing retail, employment, educational and other services via sustainable travel options.
- 6.5.22** Existing roads and natural features would assist in creating definable boundaries to development. It is noted that Part 2 of the Green Belt Review suggests that the boundary extent for Sub-Area A could be drawn more tightly than the area proposed by the site promoters. However, in this respect, it should be noted that there is an extant permission for an indoor



tennis centre incorporating indoor courts, pool, gym and outdoor facilities including outdoor swimming pool, tennis courts and golf range, which would extend the development area beyond that proposed in the review. It is therefore considered that, as the precedent for the extension of the boundary has already been set via the development management process for leisure purposes, any future residential proposal should take into account the same boundary treatment.

- 6.5.23** On balance of the issues raised above it is considered appropriate that development of 550 dwellings be brought forward in this area of search, with 300 delivered in Sub-Area A and 250 in Sub-Area B.

### **Area of Search 12: Hertford North (Sub-Area C only)**

- 6.5.24** At the end of Chapter 4 in the assessment process this area was under consideration as a marginal fail for the provision of 100 dwellings, largely due to waste water constraints. Earlier in the sieving process, highways capacity had also been raised as a concern for a higher level of development of 500 dwellings. Further investigations have since established it would be likely that the capacity of the waste water and highways infrastructure in the area could be able to support a total of 150 dwellings in this location.
- 6.5.25** In Green Belt Review terms, it has been established that the Green Belt particularly serves the purpose of safeguarding the countryside from encroachment to the east of Wadesmill Road due to the strong landscape character of the Lower Rib Valley. This, and the closer proximity of the area to the west of the B158 Wadesmill Road to access local shops, services and primary education, would favour development in the western section of the overall Sub-Area.
- 6.5.26** A potential impediment to early delivery could involve the extraction of minerals in the area; however, locating development to the south of the Minerals Preferred Area could reduce the impact of this. The area also lacks a current definable boundary and the potential for minerals extraction in the locality could mean further uncertainty in respect of resolving this issue.
- 6.5.27** While, as noted above, the area is well placed to access local services and facilities, sustainable travel options from the area to rail services, some parts of the wider town beyond the centre, and other locations are limited.
- 6.5.28** However, balancing all of the issues raised above, it is considered that the area to the west of the B158 Wadesmill Road could be suitable for the delivery of around 150 dwellings.

### **Area of Search 13: Hertford South (Sub-Area C only)**

- 6.5.29** While various factors, including waste water capacity, highways and passenger transport constraints, limited the amount of development that would be appropriate in the Sub-Area, the Chapter 4 assessment concluded that further investigation should be undertaken for the provision of up to 100 dwellings in the Mangrove Road area. Following the receipt of developer questionnaires, the Cricket Field site was withdrawn from further consideration as the landowner no longer wished to promote this area. Other land submissions in the area, other than the former Christ's Hospital Playing Field, would both 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 and Land West of Mangrove Road being distanced from local facilities and services. These proposals should therefore not be subject to further consideration.
- 6.5.30** The former Christ's Hospital Playing Field remains under consideration. The developer questionnaire response from the promoter of the site indicated that the whole 100 dwellings anticipated for the Sub-Area would be achievable in this single location. In this respect, it should be noted that this would not be intended to cover the whole site submission area, given that the western section of the site slopes down to Hagsdell Stream and has been proposed by the site promoter for communal amenity space to be associated with housing development. However, the remaining area contains an existing tree belt, which helps maintain the character of this part of this Hertford Green Finger on its western edge. If proposed development were to result in the loss of this feature, it would be of detriment to the character of the Green Finger and is therefore not recommended.
- 6.5.31** However, if development at the scale proposed by the site promoter were to be brought forward in the area not including the tree belt, it would result in a very high density development (around 50 dph). Not only would this need extremely careful planning given the site's location within the Hertford Conservation Area, but it may also appear out of context with the built form of neighbouring developments.
- 6.5.32** Whatever the density of development achieved in the area, it would consolidate the existing built form along Mangrove Road between Ashbourne Gardens and Oak Grove. The limitation of development of the site on its western side to preserve the treed area would help mitigate the impact and preserve the most visible part of this Green Finger. It would also allow the Green Finger to retain its penetration to the path at Hagsdell Lane. Part 2 of the Green Belt Review 2013 confirms this position in terms of preserving the special character and setting of Hertford in its recommendations for potential boundary alterations.
- 6.5.33** Therefore, while the site promoters have currently cited no impediment to the scale of development they propose (100 dwellings), in order to continue to protect the Green Finger's features and deliver development in character

with the neighbouring area, a lesser level of development would be more appropriate in this location. Therefore, on balance of the above issues, it is considered that the number of dwellings should be reduced to 50 to accord with the approach taken elsewhere in the District Plan of dwellings being provided at 25 dph.

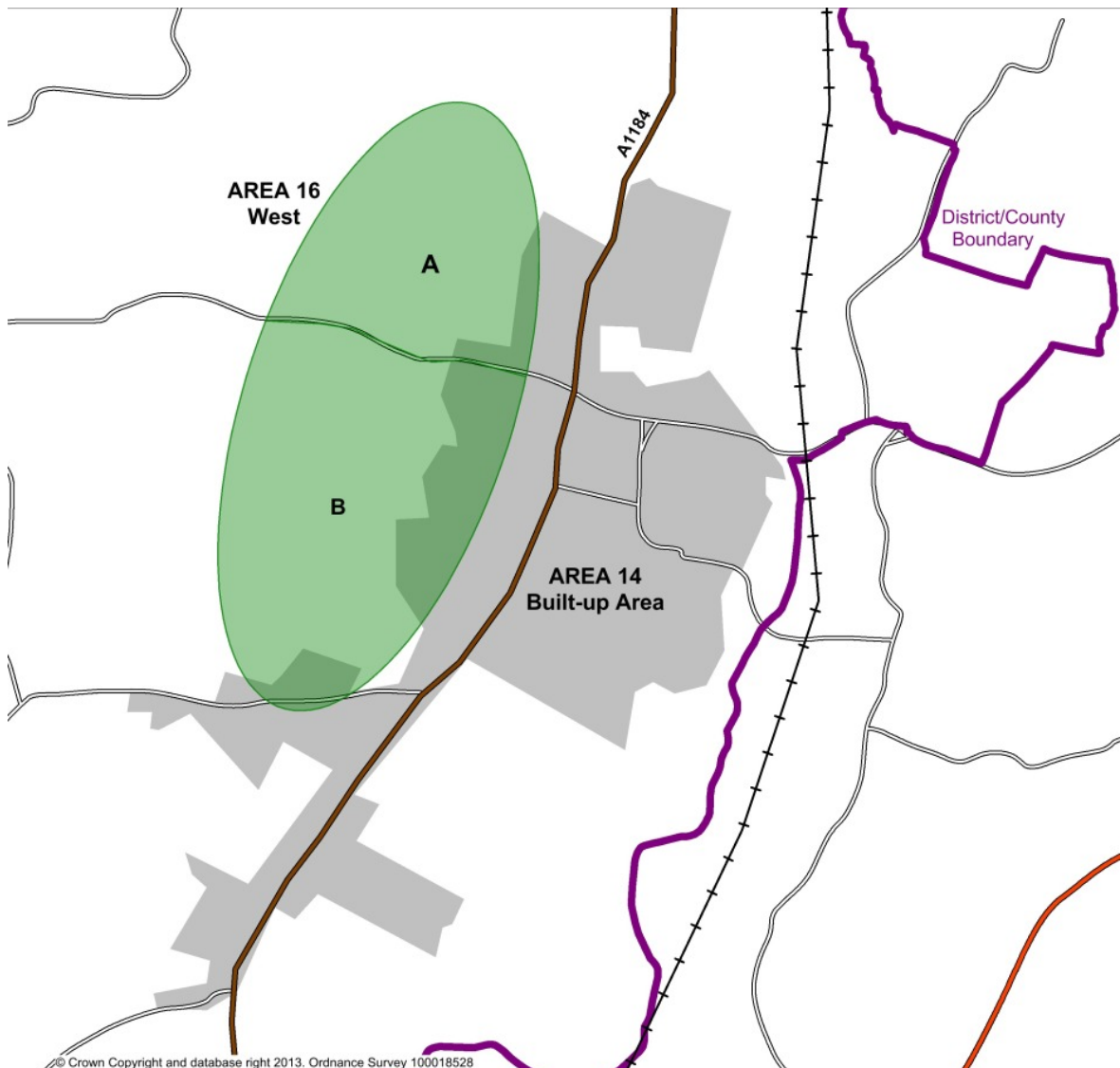
### Conclusion and Next Steps

- 6.5.34** Identified development options of 750 dwellings, as detailed above, in addition to urban capacity and known commitments would total approximately 1,646 dwellings. It is expected that windfall developments will also occur within the Plan period, which would increase this total. However, it is acknowledged that, due to the capacity constraints of the town that have been highlighted during the sieving process, it is inevitable that some of Hertford's projected housing need will be delivered elsewhere in the district.

## 6.6 Sawbridgeworth

**6.6.1** To date, assessment has demonstrated that Sawbridgeworth plays a key role in the district as a small market town, serving both the town itself and a local rural hinterland. The location of the town between the larger settlements of Bishop's Stortford and Harlow, and its good rail connection, contributes to how the town functions; predominantly as a dormitory town, providing limited employment and retail opportunities, resulting in significant outflows of residents. This is an important factor to consider when assessing how the town develops in the future. The boundaries of the town are generally not that clearly defined, and this has been confirmed through the Green Belt Review 2013.

**Figure 6.6 Shortlisted Areas of Search for Sawbridgeworth**



- 6.6.2** The following sections consider various issues facing the town, providing an up-to-date position on evidence gathered from stakeholders and technical documents.

### Education

- 6.6.3** In terms of education, development in Sawbridgeworth would generate the requirement for additional school places. At primary level, Hertfordshire County Council has indicated that there is little or no capacity in existing schools, and that Mandeville School is the only school with expansion potential. To facilitate expansion of the school by one form of entry (1FE), which would serve approximately 500 dwellings, land adjacent to the school would need to be allocated for school use in the District Plan to accommodate the provision of new school buildings and playing fields.
- 6.6.4** With regard to secondary provision, Sawbridgeworth falls within the Bishop's Stortford Schools Planning Area where a deficit of school places is forecast. Hertfordshire County Council has completed initial feasibility work into the expansion potential of all the schools within the planning area which indicates that expansion of existing schools alone is unlikely to meet forecast demand. The provision of a new secondary school is therefore likely to be required to meet the educational needs of the planning area within the plan period.
- 6.6.5** Notwithstanding this, the completed technical work indicated some expansion potential (up to 3FE) at Leventhorpe School, and it is noted that Part 2 of the Green Belt Review suggests that the built-up part of the school site should be released from the Green Belt. This may provide sufficient land to accommodate new school buildings although any expansion potential would need to be subject to further feasibility testing.

### Transport

- 6.6.6** The A1184 which runs on a north-south axis through the town suffers from congestion, especially at peak times. Congestion is a particular problem at the junctions of London Road/Bell Street and Harlow Road/High Wych Lane and transport modelling work has indicated that mitigation measures such as signalisation may be required to ease the flow of traffic. The Bishop's Stortford and Sawbridgeworth Urban Transport Plan (UTP), led by Hertfordshire County Council, is due to report in 2014, and this is expected to address the main mitigation measures required across the transport network in the study area.
- 6.6.7** Further technical work will also need to be completed to gain a greater understanding of the cumulative impact of development at Sawbridgeworth, Bishop's Stortford, Harlow and any potential development at Lower Sheering on the local highway infrastructure, in order that appropriate mitigation measures can be implemented.

**6.6.8** In terms of the passenger transport network, Sawbridgeworth has a railway station serving the line running from Cambridge to London Liverpool Street. However, the railway station is located on the north eastern fringe of the town, with relatively poor bus and pedestrian links to existing residential areas of the town.

**6.6.9** The majority of bus routes that serve the town operate along the A1184 corridor with little penetration into existing residential areas. Development in the town would make these services more viable but it is unlikely to justify new or altered routes.

### **Other infrastructure**

**6.6.10** In terms of waste water issues, correspondence with Thames Water has indicated that localised sewerage network upgrades maybe required to reduce the risk of sewer flooding.

### **Employment and Retail**

**6.6.11** Sawbridgeworth is the only town in the district that doesn't have a designated employment area and the 2012 Employment Forecasts and Strategic Economic Development Advice Report considers it unlikely that anything other than very local businesses would choose to locate in the town. This reflects the less preferable location of Sawbridgeworth in employment land terms, lying between Bishop's Stortford and Harlow, which both benefit from better road access. Any new employment provision in the town should therefore focus on providing a resource for local-scale employment only.

**6.6.12** As a smaller centre Sawbridgeworth performs a local function, providing essential services and convenience shopping to its catchment population. The town has a small supermarket and the majority of units in the High Street consist of small independent traders. The 2013 Retail and Town Centres Update Report recognises that there is significant leakage of expenditure for both convenience and comparison goods out of the town to neighbouring centres, but concludes that there is limited potential for further retail development in Sawbridgeworth.

**6.6.13** The following sections seek to further refine the work previously undertaken on the Sawbridgeworth Areas of Search in order to inform the final strategy.

### **Area of Search 14: Built-Up Area**

**6.6.14** At the end of Chapter 4, the built-up area of Sawbridgeworth had been anticipated to accommodate around 111 dwellings. Further refinement has indicated that a figure of around 11 dwellings (including both urban capacity and existing commitments) could be delivered during the plan period.



- 6.6.15** The key reason for the reduction in this figure relates to continued uncertainty over the likelihood of the site at Sawbridgeworth Football Club, Crofters coming forward for development during the plan period. The site is an outstanding housing allocation from the 2007 Local Plan which is dependent on the Football Club relocating to an alternative site to the north of the town. The Football Club has subsequently gained planning permission for upgraded facilities, and although it is not considered that any development has taken place on the site which would prevent relocation of the existing sports facilities, this again raises doubt regarding the deliverability of the site for housing development. Given this, it is proposed to remove the housing allocation designation on the site. However, given the identified shortfall of sports pitches within the M11 corridor, it is proposed to retain the designation of 14 hectares of land to the north of Leventhorpe School for sports pitch provision.
- 6.6.16** Small sites and permissions are set out in the housing trajectory in the latest Annual Monitoring Report; however, it is anticipated that further windfall opportunities are likely to become available in the urban area during the plan period.

### **Areas of Search 16 and 17: West and North (sub-area A only)**

- 6.6.17** The assessment process up to the end of Chapter 4 had envisaged that development of either 200 dwellings or 3,000 dwellings with a Sawbridgeworth bypass could potentially be achieved in the Areas of Search. This section addresses development at the higher scale which was taken forward on a Marginal Fail basis.
- 6.6.18** This rating in particular reflects concern regarding the impact of development on highway infrastructure in the town. The A1184 suffers from considerable congestion due to the large volume of traffic it carries between Bishop's Stortford and Harlow. Hertfordshire County Council, as highway authority, has indicated that a threshold of circa 500 dwellings within the town would trigger the need for a new bypass. The idea of a bypass to Sawbridgeworth has been suggested for numerous years; however, there is no firm proposal for delivery of a bypass, in particular with regard to the route a bypass should take and how it would be funded.
- 6.6.19** A theoretical desk-top mapping exercise suggested that a possible by-pass route would contain approximately 150ha of land to the west of Sawbridgeworth yielding 3,000 dwellings. Development of this scale would require significant additional infrastructure in addition to the bypass itself. It is therefore not considered that development alone could fund delivery of a bypass and the project has not been shortlisted as a transport priority for the period up to 2019 by the Hertfordshire Local Transport Body, which suggests external sources of funding may be difficult to source in the short term.

- 6.6.20** Notwithstanding issues surrounding the deliverability of a bypass, development of this scale is considered to be completely out of scale with the character of the existing town. It would require the release of a significant amount of Green Belt land to the west of the town, which would reduce the strategic gap between Sawbridgeworth and Harlow. Given the potential identification of land to the north of Harlow as a broad location for development, with the associated potential for significant Green Belt release, it is not considered appropriate to release Green Belt land on a similar scale to the west of Sawbridgeworth, to reduce the risk of coalescence between the settlements.
- 6.6.21** The 2012 Employment Forecasts and Strategic Economic Development Advice Report suggested that even with a bypass, Sawbridgeworth would be unlikely to increase its employment offer due to its location between the higher order settlements of Bishop's Stortford and Harlow. Therefore development of this scale would be likely to reinforce the significant amount of out-commuting that the town experiences now, making it a less sustainable location for development than others proposed in the district. Whilst the town has a railway station located on the Cambridge to London Liverpool Street line, this is located on the opposite side of the town, increasing the possibility of residents from any new development accessing the station by car, further increasing congestion at key junctions in the town.
- 6.6.22** On balance of the issues raised above, it is not considered that development of 3,000 dwellings to the west of Sawbridgeworth with the construction of a bypass could or should come forward within this Plan period.

### **Area of Search 16: West**

- 6.6.23** At the lower end of proposals, further information from infrastructure providers has suggested that provision of in excess of 200 dwellings to the west of Sawbridgeworth could be possible, subject to the implementation of appropriate mitigation measures to resolve identified issues with highways infrastructure, waster water infrastructure and education. Given that the housing figure to be accommodated within the built-up area of the town has been reduced due to the removal of the housing allocation designation at Sawbridgeworth Football Club, it is considered appropriate to add this number to those for the Area of Search at Sawbridgeworth West. In addition, as there are no overriding infrastructure issues which would prohibit the development of 400 dwellings, it is proposed to designate housing allocations to meet this level of development to ensure that Sawbridgeworth caters for as much of its objectively assessed housing need as possible.



- 6.6.24** To integrate new development with the existing built-up area and the town centre it is considered appropriate to locate development both to the north (sub-area A) and south (sub-area B) of West Road, and to keep it as close to the existing urban edge as possible. The problems of traffic congestion in the town are well documented, and this increases the imperative to allocate sites that are well located in relation to local facilities and to public transport routes, to enable more frequent travel by non-car modes.

### Sub-Area A

- 6.6.25** There are two sites being promoted for development to the north of West Road. It is proposed that only one site, Brickwell Fields, is allocated for development. This site wraps around Mandeville School and it is proposed to use the stream running along the western boundary of the site as the new Green Belt boundary. Part 2 of the Green Belt review concludes that allowing development further to the west and north of West Road will result in unacceptable urban sprawl as the development will be located further away from the existing built-up area of the town and there are no identifiable physical boundaries to limit the extent of development.
- 6.6.26** The developer questionnaire response from the promoter of the site proposed a dwelling capacity of 175 dwellings for the site. However, being adjacent to Mandeville School, this site would need to provide land to enable expansion of the school. Hertfordshire County Council state that an additional 1.2ha of land would be needed to expand the school to 2 forms of entry (2FE). Their preference would be for land to the west of the existing school site to be allocated for this purpose, to enable an additional or alternative site access to be created.
- 6.6.27** Therefore, it is considered that the site be allocated for the development of 100 dwellings, with land provided to enable the expansion of the primary school adjacent to the site.

### Sub-Area B

- 6.6.28** There are three landowners promoting development options to the south of West Road, stretching along the western boundary of Sawbridgeworth, to High Wych Road. At the end of chapter 4, it was considered that development in Sawbridgeworth would be best located off West Road as this would provide the opportunity for new development to integrate with the existing built-up area of the town, through better access to the town's schools, shops and railway station.
- 6.6.29** The site directly south of West Road, land at Chalks Farm, is being promoted for the development of 300 dwellings. Part 2 of the Green Belt review comments on how the ribbon development along West Road

encroaches on the openness of the land to the south and recommends that the Green Belt boundary be amended, releasing part of the site, to align with the existing development along West Road.

- 6.6.30** However, the developer questionnaire response from the promoter of the site indicates that the proposed site access will be located further along West Road beyond the strip of ribbon development. A secondary access point is proposed alongside the stream and children's play area at the east of the site. It is not considered that an acceptable primary access point could be provided here without significant engineering works in relation to the stream and some additional land being acquired from the children's play area. Therefore the principle of a site access further along West Road is accepted. However, the precise location of this access should be subject to further discussion to limit the impact on the openness of the countryside.
- 6.6.31** It is also noted that Part 2 of the Green Belt review concludes that there are limited identifiable physical boundaries currently in this location which could be used to determine the extent of Green Belt release so it would be necessary to design in a strong defensible Green Belt boundary through any development proposal. A significant area of open space would also be required adjacent to the boundary of the site to ensure that there is an appropriate transition between any new development and the wider countryside.
- 6.6.32** The second site being promoted in this sub-area is located between land at Chalks Farm and land at Thomas Rivers Hospital. It forms part of a much larger site which wraps around the whole of the west of Sawbridgeworth. Limited information has been provided by the site promoter regarding proposed development of the site and access to the site for small scale development could only be achieved through either of the adjacent sites to the north or south.
- 6.6.33** The part of the site located adjacent to the built-up area of the town lies within Flood Zone 3, which would prohibit any development from integrating with the existing urban edge.
- 6.6.34** The third site being promoted in this sub-area is land at Thomas Rivers Hospital. At the end of chapter 4, it was considered that there should be no development permitted south of The Crest within this sub-area. Part 2 of the Green Belt Review has reaffirmed this conclusion. It states how the Green Belt in this location particularly serves the purpose of preventing coalescence between Sawbridgeworth and Harlow and more significantly, High Wych. The role of the Green Belt in safeguarding the countryside from encroachment is also concluded to be significant due to the presence of the protected Rivers Orchard Nursery wildlife site, and it is considered that development would have a negative impact on the nature conservation value of the wildlife site.

- 6.6.35** A smaller scale of development adjacent to the built up area of the town, around Brook End, has been considered in response to queries about safeguarding the community use of the Rivers Orchard Nursery site. However, it is not considered that there are any alternative access points to this area other than using the road that serves the existing hospital. It is considered that a road cutting across the countryside to serve a smaller area of development adjacent to the existing urban edge would cause harm to the Green Belt in terms of encroaching on the countryside and it would make the remainder of the site vulnerable to pressure for further development.
- 6.6.36** Therefore, on balance of the issues raised above, it is considered that the land at Chalks Farm should be allocated for the development of 300 dwellings.

### Conclusions and Next Steps

- 6.6.37** Identified development options of 400 dwellings, as detailed above, in addition to urban capacity and known commitments would arrive at a total of approximately 411 dwellings. It is expected that windfall developments will also occur within the Plan period, which would increase whichever total is ultimately decided upon.
- 6.6.38** In terms of identified highways issues, further technical work will be required to identify and cost the measures necessary to mitigate the impact of development in Sawbridgeworth on the A1184. The Bishop's Stortford and Sawbridgeworth Urban Transport Plan (UTP) will follow publication of the draft District Plan, and will provide further evidence in respect of the cumulative impacts of development along the A1184 corridor. Working with East Herts Council and taking account of transport modelling and transport mitigation measures, the UTP will also address the issue of air quality at the London Road Air Quality Management Area.

## 6.7 Ware

**6.7.1** To date, assessment has demonstrated that Ware plays a key role as a market town and rural service centre serving both the town itself and rural hinterland. The presence of the River Lea, which historically influenced the town’s development pattern, provides wildlife and leisure benefits south and west of the town and helps shape the edge of the settlement at these points. However, The Green Belt Review 2013 has demonstrated that the town’s boundaries are generally considered weak to the north and east of the town.

**Figure 6.7 Shortlisted Areas of Search for Ware**



**6.7.2** The following sections consider various issues facing the town, providing an up-to-date position on evidence gathered from stakeholders and technical documents.

### Education

**6.7.3** In respect of education, the requirement for additional school places would be generated by development brought forward in the urban area of Ware and the remaining surrounding Areas of Search. In terms of primary provision, any demand generated for places would need to be met locally. Due to the vast differences in scale of the options under consideration,

this means that various scenarios need to be taken into consideration relating to the relevant levels of demand. These are therefore discussed in further detail in relation to specific Areas of Search below.

- 6.7.4** With regard to secondary provision, in addition to the effects of varying levels of demand relating to the diverse development scenarios, it also needs to be borne in mind that Ware forms part of the combined Hertford and Ware Schools Planning Area. Largely due to single sex provision of Richard Hale (boys) in Hertford and Presdales (girls) in Ware, a significant number of pupils cross-travel between the two towns to access their schools. As such, Hertfordshire County Council is in the process of carrying out feasibility work on the expansion of existing secondary schools within the planning area. However, given the level of development under consideration for both towns, and the need to satisfy a short-fall of places in the short-term, it is unlikely that expansion of existing schools will meet demand. The provision of a new secondary school is therefore likely to be required within the plan period to meet the needs of the two towns. This is discussed further below in relation to Area of Search 19 – Ware North, and Area of Search 20 – Ware East.

### Transport

- 6.7.5** Ware has good rail connections, with its station serving the Greater Anglia route from Hertford East into London. Its bus services serve the town itself, via circular routes, and also connect to wider locations. Ware has good road connections to external settlements and is also served by a western A10 bypass, which helps relieve inner routes to some extent. However, due to the constrained development pattern of the central area, including its narrow High Street with lack of rear servicing opportunities, the town centre suffers from considerable congestion, especially at peak times.

### Other Infrastructure

- 6.7.6** Concerning waste water matters, correspondence with Thames Water has indicated that there are capacity issues in locations to the north of the town that would constrain development opportunities unless new infrastructure were to be provided. This issue is discussed further below in relation to Area of Search 19 – Ware North.

### Employment and Retail

- 6.7.7** In respect of employment provision, the findings of the 2012 Employment Forecasts and Strategic Economic Development Advice Report indicate the need to protect existing designated sites, albeit that some areas may require rejuvenation. It was also recommended that consideration be given to identifying a small number of modest sites for new B1 employment in

the Hertford and Ware area. However, in considering new allocations, due consideration should be given to the impact on existing employment sites.

- 6.7.8** In respect of its retail role, Ware fulfils the function of a Minor Town Centre. For future retail provision, Ware's constrained development pattern limits the potential to expand within the central core and to improve upon its status. The 2013 Retail and Town Centres Update Report notes that "if the Asda commitment is implemented this will increase Ware's market share of expenditure". It also recognises that there "will be limited potential for additional convenience or comparison goods floorspace over and above this commitment. The priority in Ware should be the implementation of the Asda commitment, and the reoccupation of vacant shop units and small infill development in the town centre. If significant additional population growth is to be accommodated at Ware, there would need to be additional retail provision, which may not be capable of being accommodated within the town centre". However, any additional provision away from the central core would need to be balanced against the effects and potential harm to the viability and vitality of the town centre's retail offer.

### Character

- 6.7.9** The 2011 East Herts Green Infrastructure Plan has identified poor provision in Accessible Natural Greenspace at Ware, as well space for children and young people. This should be alleviated through creating better public access to the countryside resource that surrounds the settlement, including the Lee and Rib Rivers. The river corridors have been identified as areas for improvement of both habitat and physical links between settlements. Key issues are to make improved links between Hertford and Ware and the wider countryside, while also ensuring lateral links across the District, particularly if future growth is considered to the urban fringes.
- 6.7.10** The following sections seek to further refine the work previously undertaken on the Ware Areas of Search in order to inform the final strategy.

### Area of Search 18: Ware Built-Up Area

- 6.7.11** This area had been anticipated to accommodate around 147 dwellings at the end of Chapter 4. Further refinement has indicated that a figure of around 189 dwellings (including both urban capacity and existing commitments) could be delivered during the plan period. However, it should be noted that the majority of this amount relates to existing commitments, leaving only 32 dwellings identified in the SLAA without the benefit of extant permission. This figure is reflective of the fact that the town has had considerable previous success in the re-use of brownfield sites and that these opportunities have largely been exhausted. This past development, coupled with the need to protect Ware's existing employment



base, mean that it is not anticipated that the built-up area will make a significant contribution to housing supply, although it is likely that some windfall site opportunities will arise.

- 6.7.12** In educational terms, it is considered that the impact of development of around 32 dwellings would be likely to be minimal and not sufficient to generate the need for additional forms of entry in itself. However, if coupled with development either solely to the north, or to the north and east of the town in combination, any dwellings provided in the Built-Up Area would also need to be taken into account in assessing future educational provision for the town.
- 6.7.13** Small sites and permissions are set out in the current Annual Monitoring Report; however, it is anticipated that further windfall opportunities are likely to become available in the urban area during the plan period.

### **Area of Search 19: Ware North (Sub-Areas A and B)**

#### **Sub-Area A**

- 6.7.14** The assessment process up to the end of Chapter 4 had envisaged that development of either 0 or 200 dwellings could potentially be achieved in the Sub-Area. However, recognising various constraints in the area, the area was taken forward on a Fail or Marginal Fail basis. This rating in particular reflects recognition of the likely affects on amenity of any future residents caused by the juxtaposition of the site between two busy roads; the close proximity of Wodson Park and its associated activities; the site's Registered Historic Park and Garden status; and waste water capacity constraints.
- 6.7.15** A development of this level would generate the need for educational provision. Given the limitations of site size it is unlikely that it would be possible to make provision for a new school on the site and also provide the levels of housing proposed. It would also be removed from the wider town area and sustainable journeys on foot would prove problematic given the width restrictions of the A1170 and its single narrow footpath (less than 1.5m wide in places) where, due to steep banking, there would be little capacity to extend. Primary schools in Ware are generally at capacity and, even with current planned development at St Catherine's, the expansion potential of existing school sites is very limited. This would pose a conundrum.
- 6.7.16** Secondary education could only realistically be met off-site given the size of the Sub-Area, but could be achieved anywhere within the Hertford and Ware Schools Planning Area. However, until all secondary schools in the Schools Planning Area have been assessed and HCC's feasibility work

to determine the potential of the existing secondary schools to expand has been concluded, it is not known whether any additional capacity could be achieved within existing sites.

- 6.7.17** As an alternative to residential provision, the DTZ East Hertfordshire Employment Forecasts and Strategic Economic Development Advice, November 2012 suggests “the possibility of employment space development at the intersection of the A10 and the A1170 north of Ware”. This could potentially take the form of prestigious B1 development within a parkland setting. However, any proposal for employment or mixed use development in this location would need to be balanced against the potential detrimental effect on other existing designated employment areas in the town.
- 6.7.18** Given its proximity to Sub-Area B, it would be sensible for Sub-Area A to be subject to consideration in potential combination with that larger area, in the event that significant levels of development were to be brought forward in that location. In this respect, eventual land use/s for Sub-Area A could be influenced by master-planned development proposals for the entire area and the benefits of scale could help address outstanding issues such as waste water capacity and the provision of education.

## Sub-Area B

- 6.7.19** At the end of Chapter 4 the assessment process concluded that development of either 200 or up to 1,500 dwellings could potentially be achieved in this Sub-Area and was assigned a Marginal Pass or Marginal Fail rating.
- 6.7.20** At the lower end of proposals, there is relative confidence that development of around 200 dwellings could be delivered to the north of the High Oak Road/Fanhams Hall Road area. Beyond that level, development in this location could be limited by highways and waste water capacity constraints and potential impact on the town’s services and facilities.
- 6.7.21** Educational needs generated by development (at any number within the range of levels) would also have to be met. Given the position outlined above for Sub-Area A regarding the need for additional primary provision, further investigations would be necessary to examine the expansion potential of existing schools in the nearby locality (Kingshill/St. Mary’s, Tower and Priorswood) for a lower level development. For upper levels, HCC would expect the development to provide for its own school capacity (of between 2 to 3.4FE). Therefore, two new 2FE primary school sites would be required.
- 6.7.22** For secondary education at the lower range level, the need could be met anywhere within the Hertford and Ware Schools Planning Area; however, until all secondary schools in the Schools Planning Area have been

assessed and HCC's feasibility work to determine the potential of the existing secondary schools to expand has been concluded, it is not known whether any additional capacity could be accommodated within existing sites. For a proposal of between 1500 and 1700 dwellings to the north of Ware (the latter figure if Sub-Area A were also to be included) this would generate approximate need of 3.5FE of secondary school places. HCC assumes that this need could not be accommodated within the existing secondary schools in Ware and Hertford and a new school site would therefore be required to meet the need from this development. The provision of an all-through school within the development could be considered an option as a way of managing the primary and secondary pupil yield arising from this new housing.

- 6.7.23** In terms of highways issues, the Diamond modelling undertaken to date indicates that development north and east of Ware would be likely to cause problems with junction operation on the Baldock Street/High Street corridor due to limited existing capacity for further growth in the High Street environment. Ware is on the periphery of the HSGTM model and the town has consequently been modelled in limited detail; therefore only the more strategic impacts of the development can be illustrated and not the detailed local junction impacts within the town itself.
- 6.7.24** A development of 1,300 dwellings (plus 500 jobs) was modelled with the assumption that the main access would be provided via a direct link into the A1170/A10 roundabout. The results indicate that the combined effect of this (and other developments that could come forward in the Plan) would be an increase in flows in peak periods on the A10 corridor. Capacity impacts would be apparent in the southern section in the Cheshunt area, where signalised junctions already have capacity constraints. This level of development would also impact upon the M25 at junction 25.
- 6.7.25** There are also predicted to be considerable increases in flow on the A602 Westmill Road in peak periods. This single carriageway stretch of road already carries large volumes of traffic and the addition of traffic from development at this level would lead to it becoming over capacity in the PM peak.
- 6.7.26** Development of this amount would also contribute to an increase in flow on the A1170 Wadesmill Road/High Street and Viaduct Road southbound in the AM peak. This section has existing congestion issues and its constraints limit the potential for physical mitigation measures. Additional flows would exacerbate this situation. Likewise, this level of development would increase the flow of vehicles travelling on the A119 towards Hertford, which is already congested at the Hertford end. Any development proposals would need to seek to minimise the additional vehicular traffic from the development into Ware and Hertford.

- 6.7.27** In respect of waste water provision, development in the area would not be able to proceed without considerable upgrades to the sewerage system. To avoid significant on-going disruption to the town centre, an additional pumping station combined with a new sewer connecting to the east of Ware would be required.
- 6.7.28** Other services in Ware would also be impacted by the dwelling levels proposed and therefore it would be important to establish that any demand for these that could not be satisfied by existing facilities in the town would be met within the development.
- 6.7.29** All of the above necessary requirements would have cost implications and it would be important to establish if development at the upper level would be viable to proceed on its own terms.
- 6.7.30** On balance of the issues raised above it is considered that development of around 200 dwellings could, with a relative degree of certainty, be achieved in this Sub-Area. A much higher level of development towards the upper end may ultimately prove possible; however, there are many outstanding issues that have been highlighted above that would need to be resolved in this respect and it is therefore not possible at this time to offer any degree of certainty as to what level of provision above the indicated 200 dwellings should be made.
- 6.7.31** However, if development of 200 dwellings in the High Oak Road/Fanhams Hall Road area were to proceed in isolation, this could prejudice the successful master-planning of development at a larger scale in the area. In respect of any larger scale proposals, it would also be appropriate to consider development in this location in combination with Area of Search: 20 – Sub-Area A.

### **Area of Search 20: Ware East (Sub-Area A only)**

- 6.7.32** At the end of Chapter 4 in the assessment process this area was under consideration as a Fail or Marginal Fail for the provision of either 0 or 1,300 dwellings. However, it should be noted that this location was carried forward to Sieve 3 solely on the basis that it would not be suitable in isolation but should only be considered as an option in combination with Area of Search 19: Ware North. Therefore, the following text relates to the consideration of the potential for development that would jointly cover both locations rather than Ware East Sub-Area A on its own.
- 6.7.33** The benefits of bringing both areas forward in tandem would not only relate to meeting need in the Housing Market Area, but also to the viability of providing necessary infrastructure. In particular this would concern, in terms of highways issues, the provision of a link road between the B1004 in the Widbury Hill area and the A1170 Wadesmill Road/A10 junction to

relieve traffic impact; and, in respect of waste water capacity, the construction of a new sewer connecting from the north to the east of Ware. These issues are both discussed further below.

- 6.7.34** In terms of transport, Diamond modelling work undertaken by HCC suggests that with 3000 dwellings, as with the scenario involving development to the north of the town, there would be additional traffic and stress on a number of roads in the locality, particularly the A602, A1170 north & south of Ware, A119 Ware Road & Thieves Lane, Hertford. Existing congestion problems on the Baldock Street/High Street corridor would also be exacerbated. Due to density of housing and high pedestrian usage Air Quality impacts would need to be carefully considered in urban environment. All of these issues are likely to be more severely affected by the addition of the 1,300 dwellings above the scenarios for development limited solely to the north of the town.
- 6.7.35** A large number of additional vehicles would further impact on the A10 between the A602 and the M25, as detailed above for Area of Search 19: Sub-Area B, and there would be additional increase in stress on the A120.
- 6.7.36** In terms of waste water provision, the area would be able to connect to the new sewer that would be necessitated by development within Area of Search 19. This would already be planned to run through Area of Search 20 in order to connect to existing infrastructure to the east of Ware.
- 6.7.37** In respect of education, a development of 3,000 dwellings would provide demand for 6FE of both primary and secondary school places. All identified need would be expected to be met within the development area. This need would equate to the provision of three 2FE primary schools and a new 6FE secondary school; the latter of which could also provide for expansion beyond this level to help meet the deficit in the overall Hertford and Ware Schools Planning Area.
- 6.7.38** An important issue for consideration is the impact that the upper level of development would have on the town and its services. According to the 2011 Census, Ware had 8,165 dwellings at that date. Should development at the upper end suggested for the joint area encompassing Area of Search 19: Ware North and Area of Search 20: Ware East, be brought forward, these 3,000 dwellings would represent additional development equivalent to approximately 36.7% of the existing housing stock in the town. This would undoubtedly have a considerable impact on the town's services and any new development would need to ensure that demand for these that could not be satisfied by existing facilities in the town would be met within the area.

### Conclusions and Next Steps

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- 6.7.39** Identified development options (of 200 to 3,000 dwellings) in addition to SLAA sites and known commitments would arrive at a total between approximately 232 and 3,032 dwellings, dependent on the strategy selected for the town. It is expected that windfall developments will also occur within the Plan period, which would increase whichever total is ultimately decided upon.
- 6.7.40** In terms of highways issues, further detailed modelling work will be required at a town-based, rather than at the previous strategic-based, level to fully establish the detailed impacts of the development proposals in Ware. The feasibility and cost implications of providing a link road from the east of the town to the north A1170/A10 area would also need further investigation. A more detailed understanding would also be required of the impacts that development in the north/north and east of Ware area would have on the A10 and M25 junction 25. Mitigation measures would also need to be investigated in respect of the identified A602 capacity issues. Moreover, the findings of the currently on-going A414 study would need to be factored in to any understanding of the highways situation for Ware.
- 6.7.41** The Highway Authority has identified that further work will be required to determine the possible cumulative impacts of higher levels of development and whether they would be severe. Mitigation measures will need to be considered via a masterplan approach to determine whether potential impacts could be managed.
- 6.7.42** In respect of waste water issues, further work would be required to establish the route, details of construction and cost of providing a new sewer from the north to the east of Ware.
- 6.7.43** Educational provision issues also require resolution and the conclusion of HCC's feasibility work to determine the expansion potential of the existing secondary schools in the Hertford and Ware Schools Planning Area is awaited to inform the process.
- 6.7.44** Further investigations into health and other services would also be necessary to ensure that the needs of future residents could be met.
- 6.7.45** Due to the level of uncertainty surrounding key infrastructure provision and the cumulative effects of potential development on the town discussed above, it is considered that it is not possible at this stage for specific dwelling numbers to be allocated either to the area to the North (beyond 200 dwellings) of Ware or, potentially, to the North and East of the town. Further work will be required to establish whether it will be possible to achieve development of a significant scale in this location.



- 6.7.46** However, it should be noted that, even if development at the upper end of the range proposed for Ware were to be ultimately achieved, there would remain a shortfall of dwellings for the Housing Market Area and therefore some of the objectively assessed need for the area will of necessity have to be delivered elsewhere in the district.

## 6.8 Villages

**6.8.1** Chapter 4 presented the results of Sieves 1 and 2 and concluded whether or not a village was considered suitable for development. On the basis of the results presented it was clear that there are three fairly distinct groups of villages.

- **Group 1 Villages** – these are the larger and most sustainable villages in the district. They have a primary school and a range of other facilities. Growth in these areas will potentially help to sustain existing shops and services (including primary schools), deliver affordable housing, provide local job opportunities and deliver community benefits. At least a 10% increase in housing is considered achievable and sustainable in these settlements.
- **Group 2 Villages** – these are generally smaller villages with some services and facilities but often without a primary school. Infill development may be appropriate in these villages to support existing facilities and services.
- **Group 3 Villages** – these are generally amongst the smallest in East Herts. These villages have a poor range of services and facilities and it is often necessary for local residents to travel outside the village for most of their daily needs. These villages generally lack any food shops, have no primary school and may not have a permanent post office or a village hall or meeting place. Development in these villages, other than that appropriate in the Green Belt and Rural Area Beyond the Green Belt, would be unsustainable.

**6.8.2** The following sections seek to further refine the work previously undertaken on the villages in order to inform the final strategy.

### **Villages scoring a pass or marginal pass at the end of Sieve 2**

**6.8.3** The following villages scored either a pass or marginal pass at the end of Sieve 2.

- Braughing
  - Buckland
  - Colliers End
  - Cottered
  - Hadham Ford
  - High Cross
  - High Wych
  - Hunsdon
  - Little Hadham
  - Much Hadham • Puckeridge
  - Standon
  - Stanstead Abbots and St Margarets
-

- Thundridge
- Wadesmill
- Walkern
- Watton-at-Stone
- Westmill
- Widford

- 6.8.4** This group generally consists of the larger and most sustainable villages in the district. Most of these could be considered to meet the definition of a Group 1 Village. However, there are some very small villages within this list (Buckland, Colliers End, Cottered and Westmill) and these have therefore been re-visited, taking account in particular the size of the settlement and its capacity to accommodate further development.
- 6.8.5** High Wych, Thundridge, Wadesmill have also been reassessed given their Green Belt status and proximity to other potential strategic development locations.
- 6.8.6** Finally, Stanstead Abbots and St Margarets have also been reconsidered on the basis of their particular environmental constraints and education capacity issues.
- 6.8.7** It is recommended that all other villages (Braughing, Hadham Ford, High Cross, Hunsdon, Little Hadham, Much Hadham, Puckeridge, Standon, Walkern, Watton-at-Stone and Widford) be identified as Group 1 Villages.

### Area of Search 29: Buckland

- 6.8.8** Buckland is a small village to the north of the district. At the end of Sieve 1 Buckland scored a marginal fail on the basis that achieving a 10% growth would be difficult due to landscape constraints. There is no shop, primary school or any other community facilities in the village. At the end of Sieve 2 Buckland scored a marginal pass on the basis that development could potentially contribute to an improved bus service provision along Route 331. However, whilst it is acknowledged that other centres may be accessible by public transport, it is concluded that given the size of the village and its lack of services and facilities, Buckland is not a sustainable location for growth. Consequently it is recommended that Buckland be identified as a Group 3 Village.

### Area of Search 31: Colliers End

- 6.8.9** Colliers End is a small village located on the old A10. At the end of Sieve 1 the village scored a marginal pass, although it was acknowledged at the time that the lack of community facilities is an issue. At the end of Sieve 2 the village scored a pass on the basis that development could contribute to an improved bus service provision. The pass also reflected the fact that Colliers End forms part of a 'cluster' of settlements along the A10 (including

High Cross, Thundridge and Wadesmill) where it is possible to 'share' community facilities. Whilst access services and facilities using public transport is possible, given that Colliers End is a very small village and has no facilities within the village itself it is concluded that it is not a sustainable location for growth beyond infill development. Consequently it is recommended that Colliers End be identified as a Group 2 Village.

### **Area of Search 32: Cottered**

- 6.8.10** Cottered is located on the A507 with reasonable access to Buntingford. At the end of Sieve 1 the village scored a marginal pass, although it was acknowledged at the time that the lack of community facilities is an issue. There was no change to the score at the end of Sieve 2. Whilst access to services and facilities using public transport is possible, given that Cottered is a relatively small village and has limited facilities within the village itself, it is concluded that it is not a sustainable location for growth beyond infill development. Consequently it is recommended that Cottered be identified as a Group 2 Village.

### **Area of Search 58: Westmill**

- 6.8.11** Westmill is located just off the A10 with reasonable access to Buntingford. At the end of Sieve 1 the village scored a marginal fail, as there is no primary school and there is no direct bus service into the village. At the end of Sieve 2 Westmill scored a marginal pass on the basis that development could potentially contribute to an improved bus service provision along Route 331. However, given that Westmill is a small village and has limited facilities within the village itself, it is concluded that it is not a sustainable location for growth beyond infill development. Consequently it is recommended that Westmill be identified as a Group 2 Village.

### **Area of Search 41: High Wych**

### **Area of Search 52: Thundridge**

### **Area of Search 54: Wadesmill**

- 6.8.12** These villages are currently washed over by the Green Belt. Previously the Council has inset villages from the Green Belt where more than infill development has been proposed. If these villages were proposed as Group 1 Villages (i.e. villages which could accommodate greater than infill development) it would follow then that they should be inset from the Green Belt. However, given the continued uncertainty in respect of land North and East of Ware and North of Harlow, and the close proximity of these villages to these locations, it is considered inappropriate to inset these villages until such time that the scale and form of development in these locations is known, so to avoid merging and weakening of strategic gaps.

This approach is confirmed in Part 2 of the Green Belt Review 2013. Consequently it is recommended that High Wych, Thundridge and Wadesmill all be identified as Group 2 Villages.

#### Area of Search 49: Stanstead Abbots and St Margarets

- 6.8.13** Whilst the adjacent settlements of Stanstead Abbots and St Margarets are identified in the Local Plan 2007 as locations to concentrate and direct development, more recent up-to-date assessments call into question whether or not they should continue to be identified as such. At the end of Sieve 1 the villages scored a marginal fail, on the basis of environmental constraints (including flood risk), education capacity and strategic gap issues. At the end of Sieve 2 the villages scored a marginal pass on the basis that development could potentially contribute to an improved bus service provision along Route 351.
- 6.8.14** Whilst there is land potentially available for development beyond the built-up area, in the Green Belt, given the importance of the strategic gap in this location, together with potential impacts on nearby Wildlife Sites of National and European importance, this is not considered to be a sustainable option.
- 6.8.15** Development could potentially take place within the existing built-up area; however, the local school (St Andrews C of E Primary) is full and oversubscribed and there is no capacity within the site to expand. If significant further housing is allowed then pupils would either have to travel out of the area or the school would need to relocate to a site beyond the existing built up area. However, as noted above this is not considered to be a sustainable option.
- 6.8.16** In light of the above, and despite potential improvements to the bus service, Stanstead Abbots and St Margarets are not considered a sustainable location for growth beyond infill development. Consequently it is recommended that Stanstead Abbots and St Margarets be identified as Group 2 Villages.

#### Villages scoring a marginal fail at the end of Sieve 2

- 6.8.17** The following villages scored a marginal fail at the end of Sieve 2:
- Aston
  - Bayford
  - Birch Green
  - Cole Green
  - Dane End • Furneux Pelham
  - Hertingfordbury
  - Letty Green
  - Spellbrook
  - Tewin

- 6.8.18** Whilst acknowledging that each of these villages have particular constraints, some limited infill development within the existing built up area of the village would not be inappropriate and could assist with meeting local needs. All of these villages are therefore considered suitable to identify as Group 2 Villages.

### **Villages scoring a fail at the end of Sieve 1 or 2**

- 6.8.19** The following villages scored a fail at the end of Sieve 1 or 2:
- Benington
  - Brickendon
  - Datchworth
  - Great Amwell • Hertford Heath
  - Stapleford
  - Tonwell
  - Waterford

### **Area of Search 25: Benington**

### **Area of Search 34: Datchworth**

### **Area of Search 50: Stapleford**

### **Area of Search 53: Tonwell**

- 6.8.20** Benington, Datchworth, Stapleford and Tonwell all scored a marginal fail at the end of Sieve 1. The villages were subsequently 'down-graded' to a fail at the end of Sieve 2. However, this was on the basis that if greater weight were given to the issue of primary schools alone then the cumulative impact of a 10% growth in all of these locations would lead to particular issues around primary education capacity. If a lower than 10% increase in housing stock is considered then there is potential capacity within the local schools to accommodate a limited amount of development. In light of this and acknowledging that each of these villages has access to a range of other services and facilities, it is recommended that they are all identified as Group 2 Villages.

### **Area of Search 38: Hertford Heath**

- 6.8.21** Hertford Heath scored a fail at the end of Sieve 1 on the basis that it is located in the strategic gap between Hertford and Hoddesdon, on environmental grounds and due to education capacity issues. Substantial development would clearly be inappropriate on these grounds. However, on the basis that Hertford Heath is currently inset from the Green Belt, it is considered appropriate to identify Hertford Heath as a Group 2 Village



where some limited infill development could take place within the existing built up area, although it is acknowledged that there will be few opportunities.

- Area of Search 28: Brickendon
- Area of Search 36: Great Amwell
- Area of Search 56: Waterford

**6.8.22** All of these villages scored a fail at the end of Sieve 1. The conclusions have been revisited and are considered to be correct; development in any of these villages would be inappropriate and as such they should be identified as Group 3 Villages.

### Conclusion

**6.8.23** The District Plan will classify the villages into the three groups set out above (i.e. Group 1, Group 2 and Group 3 Villages) reflecting their relative sustainability. This will be an important element of the overall development strategy, helping to direct housing to the most sustainable locations and control the level of windfall development that takes place in the least sustainable areas of the district, whilst enabling the potential recycling of land and delivering new homes to meet local housing needs.

## 6.9 East of Welwyn Garden City

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

**6.9.1** To date, work has demonstrated that there could be many advantages to development at this area of search. The area is flat and well-screened. There are strong potential boundaries, and the potential for a robust buffer at a new Panshanger Country Park. This has been confirmed by the Green Belt Review 2013 as reported in this section. The test assumption for this area was 2,000 dwellings.

**Figure 6.8 Shortlisted Area of Search for Land to the East of Welwyn Garden City**



**6.9.2** There are good connections to a major town (Welwyn Garden City) and the area is approximately equidistant between railway stations at Hertford North and at Welwyn Garden City, both 3-4kms away with the potential for a bus link between the two. There is good access to the A414, and Hatfield Business Park is nearby.

### Duty to Co-Operate

**6.9.3** The area adjoins Welwyn Hatfield Borough to the south, although there is a wedge of land south of the B195/Birchall Lane which also lies within East Herts District.

**6.9.4** Welwyn Hatfield Borough Council identified the area as an area for Potential Expansion in its Core Strategy consultation in November 2012m, and stated that it would support East Herts Council, should the latter seek to bring forward development in this area.

**6.9.5** In the same document the Borough Council discounted the Lafarge land within its administrative area. However, it is understood that another Core Strategy consultation in 2014, and at the present time it is not known whether there are any proposals to reconsider inclusion of the Lafarge land. If the Borough Council decides to bring forward adjoining land within its administrative area then this is likely to give rise to the need for further joint working.

### **Green Belt**

**6.9.6** The Green Belt Review 2013 recommends release of the area north of the B195 Birchall Lane and west of Panshanger Lane, subject to the provision of a landscape buffer to protect the adjacent ancient woodland. Boundaries running along the roads are likely to be stronger in Green Belt terms than the existing boundaries along the edge of the residential built-up area of Welwyn Garden City. South of the B195 within the area of search there no clear boundaries before the administrative boundary with Welwyn Hatfield is reached. The Green Belt Review therefore recommends a further cross-boundary Green Belt Review with Welwyn Hatfield District in this area.

### **Landscape and Urban Form**

**6.9.7** Sieve 3b concluded that development east of Welwyn Garden City could provide a coherent urban form. Key factors include the firm edges provided by the proposed Panshanger Country Park, the internal structure provided by the woodland blocks and Moneyhole Park, and the strengths of Welwyn Garden City in terms of its past and current function and capacity. The area is largely flat and is screened from the wider area. The provision of a new Panshanger Country Park on the other side of the lane could provide an accessible piece of strategic Green Infrastructure which enhances the setting of both Hertford and Welwyn Garden City.

### **Designated Wildlife Sites**

**6.9.8** There are no internationally or nationally designated wildlife sites in the area. The nearest SSSI is at Tewinbury to the north and would not be impacted by development in this area. However, it may be that traffic here could add to the cumulative volume of traffic on the A10, and the impact on Broxbourne Hoddesdonpark Woods Special Area of Conservation where it passes within 200 metres of the A10 would need further consideration.

- 6.9.9** There are a number of areas of locally-designated areas of woodland, including Blackthorn Wood, Henry Wood, Birchall Wood. These areas could be accommodated with the designation of an appropriate landscape buffer. Panshanger Park wildlife site is located on the opposite side of Panshanger Lane and could be accommodated through a suitable development buffer along Panshanger Lane. South of Blackfan Road lies Great Captain's Wood. The treatment of this area would need to be subject to further discussion with Welwyn Hatfield Borough Council, if this area were to be brought forward for further development.

## Economy and Retail

- 6.9.10** East Herts Council's Strategic Economic Development Advice (DTZ, 2012) states that: "The site proposed is located on the dual A414 which provides direct access from Hertford and Ware to the A1(M).
- 6.9.11** *"Given the wide range of employment opportunities in Welwyn Hatfield, and more generally in the A1(M) corridor, new residents would have access to jobs, but would probably be very reliant on car transport to access jobs, other than in town centre locations, with additional traffic volumes focused on the A414, probably with the majority of outward journeys being to the west.*
- 6.9.12** *"If this option were to be taken forward, consideration might be given to a modest employment land allocation as part of the scheme, which would in some way compensate for difficulties in identifying a site for modern B1 development in a high visibility, high accessibility location in Hertford and Ware."*
- 6.9.13** The Retail and Town Centres Study Update (November 2013) does not directly address retail opportunities within this area of search. However, it does note that: *"The larger growth options may generate the need for a limited amount of retail floorspace or a local centre within the growth location areas, particularly where they are less well connected to existing centres. Any planning applications submitted that include an element of retail floorspace would need to assess the appropriate scale of floorspace in the context of the needs of the new population (and adjoining areas) and the potential impact on the vitality and viability of existing centres."* (Page 21). The study notes that Welwyn Garden City is one of the main shopping centres in the sub-region.

## Transport

- 6.9.14** Paragraph 5.3 of the Transport Update (November 2013) states that *"there is a risk that no viable solutions may be found in relation to online improvements on the A414 in Hertford (through the A414 corridor study) or on the A10 (Broxbourne Transport Study) and that the improvements identified as part of the Welwyn Hatfield Local Plan modelling and design*

*work may be insufficient to accommodate large scale development for both districts in the south east Welwyn Garden area. The A414 study is due to report in mid February 2014, however, it is not clear when Welwyn Hatfield and Broxbourne will have obtained the required evidence for the transport impacts associated with East Herts sites in their areas.”*

- 6.9.15** Table 2 (Transport Evidence for Individual Sites) states that Diamond work (based on 2,000 dwellings in East Herts) *“suggests additional traffic & stress on B195 Birchall Lane / Black Fan Road & Cole Green Lane which are likely to become highly congested. Also additional traffic and stress on A414 & A1M junctions 3-4. Access to the development should be considered via local road network than A414 primary route.”*
- 6.9.16** In terms of likely mitigation measures, the same table states that *“potential capacity improvements identified for A414 and A1m junctions plus Mundells gyratory and Birchall Lane / A414 junction as part of Welwyn Hatfield Local Plan work. Capacity improvements also likely to be required for B195 corridor. Detailed modelling work has not yet been undertaken of this area.”*

### Education

- 6.9.17** Development in this location will need to provide for its own school capacity including the provision of a 2FE primary school site, with capacity to expand to 3FE, together with a new secondary school site. The County Council’s schools response (September 2013) draws attention to the possibility of a larger urban extension including some land in Welwyn Hatfield Borough’s administrative area. At the present time the prospects for such a development are unknown, although should Welwyn Hatfield Council decide to bring forward this land then a joined-up approach to provision of additional schools capacity would be required.

### Delivery

- 6.9.18** Lafarge Tarmac controls the majority or the land in this area of search, including the part nearest the existing built-up area. Lafarge’s landholdings extend south of Birchall Lane (B195) into Welwyn Hatfield District. Lafarge Tarmac is promoting a joined-up approach to cross-boundary planning involving an urban extension on its land on either side of the administrative boundary. The area to the north of Birchall Lane it describes as ‘Land at Birchall Farm’ and to the south is ‘Land at Cole Green’.
- 6.9.19** In a document submitted in response to a meeting with ATLAS (see [www.eastherts.gov.uk/developinfo](http://www.eastherts.gov.uk/developinfo), dated September 2013), Lafarge proposes a small new neighbourhood centre of approximately 2.02 hectares at Birchall Farm, co-located with the proposed primary and secondary schools.

- 6.9.20** The same document includes a plan for the sequencing of mineral removal in stages. The document states that “The sequence of mineral removal at Birchall Farm will be campaigned out within years 1-5 of the EHDC plan period in combination with a sequence of land restoration to development platforms.
- 6.9.21** *“Following the completion of mineral removal construction will commence on unworked land beginning in 2020. Access for construction traffic and land restoration will be provided. Moving around the site to reflect the sequence of land restoration, housing development will be brought forward during the medium term of the plan period. Completion of Birchall Farm is estimated after 8.5 years.”*
- 6.9.22** The remainder of the land within the area of search is owned by the Gasgoyne Cecil (Hatfield) Estate. This includes land fronting Panshanger Lane and, to the south of the B195 Birchall Lane, between Great Captain’s Wood and the A414.
- 6.9.23** The notes of a meeting with ATLAS in October 2013 confirm the size of the three parcels adjoining the Lafarge Tarmac land as being (north to south) approx. 14ha, 8ha and 4.5ha. The sites may actually be able to accommodate a greater number of houses than currently set out, subject to further testing and evolution of a wider masterplan. According to the meeting notes, Hatfield Estates are keen to work with Lafarge Tarmac and both Councils to evolve a comprehensive masterplan that includes these land parcels to the west of the A414.
- 6.9.24** East Herts Council concludes from the review of delivery information that the area is capable of delivering around 1,700 dwellings within East Herts, taking into account land owned by Lafarge Tarmac and also by the Hatfield Estate. Given the need for prior mineral extraction, the commencement of residential development is unlikely to be achievable until after 2021. However, this figure would be dependent on masterplanning work including assessment of the mix of uses.

## Conclusions and Next Steps

- 6.9.25** From the work undertaken through the Supporting Document, it is clear that there are many reasons to consider bringing forward this area for development. Development appears to be deliverable to a realistic timescale in the later part of the plan period. The minerals and site phasing issue appears to be clear, although further joint discussions with Hertfordshire County Council as the Minerals Planning Authority will be needed.
- 6.9.26** If the option for development west of Hertford (Area of Search 11) is brought forward as well as development in this area, then there would still be a robust Green Belt buffer preventing coalescence between Welwyn Garden



City and Hertford. The provision of an open-access pedestrian and cycle link through a new Panshanger Country Park would provide a good link for pedestrians and cyclists between the two towns, complementing the Cole Green Way cycle route further to the south.

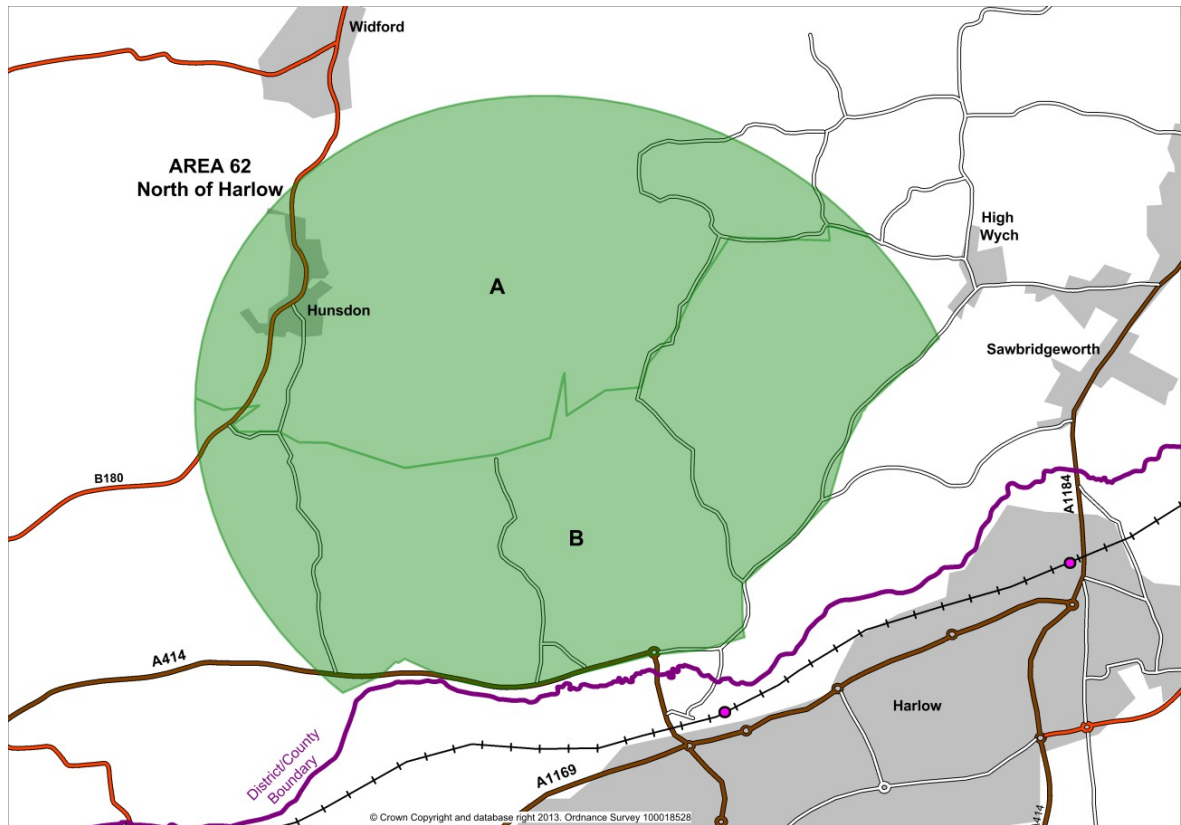
- 6.9.27** If development is brought forward in this area as part of the District Plan, Policy would need to take account of proposals nearby within Welwyn Hatfield Borough. If the Borough Council's Core Strategy ultimately decides to bring forward the nearby Lafarge Tarmac land within its administrative area, then it would be sensible to consider a joint planning framework for a comprehensive planning approach to the area. Further discussions with Welwyn Hatfield Borough Council will be needed in relation to the issue of unmet housing need.
- 6.9.28** The main concern with development in this area relates to transport. Hertfordshire County Council's Transport Update (November 2013) underlines concerns about the capacity of the A414. A significant amount of further transport work is likely to be needed, including the Highways Agency in relation to the impact on the A1(M) junction 4, as well as the County Council. If this area is brought forward, it will be necessary to work closely with the developers' transport consultants to assess and scrutinise a range of mitigation measures.

### 6.10 North of Harlow

#### Area of Search 62: North of Harlow

- 6.10.1** The assessment in Chapters 4 and 5 drew attention to the different conclusions that may be drawn depending on the issues under consideration. For example, consideration of the sub-regional economy weighs in favour of a strategic scheme in this area, but consideration of local landscape weighs against it. Chapter 6 focuses on the main remaining issues for weighing in the planning balance.

**Figure 6.9 Shortlisted Area of Search for Land to the North of Harlow**



**6.10.2** Two alternative test concepts for development at different scales in broadly the same area were put forward as part of the original 69 areas of search. The concept of a detached new settlement separated from Harlow in the Hunsdon Area was dismissed in Sieve 3. However, given the distance across the Stort Valley, it could be that even development directly abutting the Eastwick/A414 roundabout would effectively form a new settlement, rather than an urban extension to Harlow. To avoid confusion Area 69 has been merged with area 62 to enable testing of development at an upper level of 10,000 dwellings and a lower level of 5,000 dwellings.

### Duty to Co-Operate

**6.10.3** The Duty to Co-Operate is an important consideration in relation to this area of search. Harlow Council is seeking to grow the town to achieve increased critical mass to support regeneration. Harlow Council supports growth to the north to support these objectives, provided that growth is underpinned by the necessary supporting infrastructure. Further consideration of the regeneration issue is provided in the regeneration section below.

**6.10.4** Sieve 2 suggested that Harlow Council could potentially meet its own projected housing needs within its administrative boundaries to the east. At a recent Member-level meeting, Harlow Council acknowledged this point, but stated that it may wish to seek higher levels of development in

order to achieve affordable housing (Duty to Co-Operate Update Report, District Planning Executive Panel 3rd December 2013). However, Harlow Council appreciates that this area lies within East Herts District and that should development in this area come forward it is anticipated to contribute to meeting East Herts' own housing needs.

- 6.10.5** The various potential growth options for Harlow were considered through the Harlow Options Appraisal (2010), the findings of which were guided by the East of England Plan. In the absence of the regional plan the only mechanism for determining strategic cross-boundary housing considerations is the Duty to Co-Operate. Land to the south and west of Harlow lies within the administrative area of Epping Forest District. Epping Forest District Council is currently testing options in this area, and there are planning applications submitted for up to 2,500 dwellings at Latton Priory and further applications at Sumners.
- 6.10.6** The Strategy Report will give further consideration to the application of the Duty to Co-Operate in the sub-region.

### Green Belt

- 6.10.7** The Green Belt Review 2013 states that the Green Belt north of Harlow serves the purposes of checking the unrestricted sprawl from the built-up area of Harlow, prevents merging with Sawbridgeworth particularly at the eastern end, and safeguards the countryside from encroachment. It helps to preserve the setting of Harlow, particularly to the south of area of search 62 around the Stort Valley slopes.
- 6.10.8** The boundary review notes that the A414 and the River Stort present strong, defensible boundaries to the south of the area of search. There is no identifiable continuous strong boundary to the north, although there are a number of sections of ancient woodland which provide strong boundaries individually but would need links between them established if they were to be used as a Green Belt boundary.
- 6.10.9** If parts of the Green Belt in this location were to be released to accommodate development, East Herts Council would seek to redefine the boundary. The location of the inner boundary to development would be dependent on the scale and form that development would take. Even if the principle of development were to be agreed, the scale and form of development in this area is uncertain, given the lack of strong boundary features and many other factors. Although an assumption was made as to the scale, owing to the significant number of dwellings, a small change in this figure could have a large impact on the form and consequent amount of Green Belt that would need to be considered for release.
- 6.10.10** The Strategy Report will give further consideration of mechanisms for addressing future Green Belt issues.

## Landscape and Urban Form

- 6.10.11** Sieve 3b suggested that development of significantly more than 10,000 dwellings is unlikely to be feasible given the extent of land availability and the potential for coherent urban form. It was also suggested that development of fewer than 5,000 dwellings would result in incoherent urban form, isolated from Harlow across the Stort Valley. Fewer than 5,000 dwellings would provide insufficient critical mass to support the necessary on-site infrastructure and facilities, for example in relation to schools and retail facilities, and would therefore be less sustainable as people would have to travel out of the site. Added to this is smaller-scale developments would be unlikely to be able to fund the very considerable infrastructure costs, for example to bridge the valley and provide the wide range of other infrastructure.
- 6.10.12** North of Harlow was divided into three sub-areas based on the Landscape Character Areas for the Hunsdon Plateau (Sub-Area A) and the Stanstead and Pishiobury Parklands (Sub-Area B) and the River Stort (Sub-Area C). In view of national requirements including the Duty to Co-Operate, landscape concerns, although significant, are not considered sufficient to reject options at Sub-Areas A and B north of the Stort at this stage.
- 6.10.13** Sub-Area C in the Stort Valley was discounted at Sieve 1, recognising the very significant landscape and environmental functions of the Stort Valley. The exception to development in the Stort Valley was the proposal for development at Terlings Park. Outline permission was granted in March 2013 subject to a Section 106 agreement, and a reserved matters planning application for 200 dwellings at Terlings Park was granted planning approval at Development Management Committee on 6th November 2013. This development will therefore be taken out of the strategy selection process and added to the list of commitments. It is anticipated that development will start soon after discharge of the conditions.

## Designated Wildlife Sites

- 6.10.14** Internationally designated wildlife sites at Epping Forest, Hoddesdonpark Woods and the Lea Valley could be impacted from additional traffic, although this matter needs further work. The A414 crosses within 200 metres of the Lea Valley Special Area of Conservation (SAC). There may also be impacts on other internationally designated sites including Epping Forest SAC and Broxbourne Hoddesdonpark Woods. The Habitats Regulations Assessment Screening Report (2012) suggested that criteria-based policies could be used to ensure that environmental impacts are satisfactorily resolved before development comes forward.
- 6.10.15** There is an SSSI (national designation) at Hunsdon Meads. There are a number of locally designated wildlife sites. There are no grounds for discounting development in this area because of impact on national and

local wildlife sites. Sensitive design is likely to be able to mitigate the impacts through a Green Infrastructure Strategy. Further information on this is contained within Chapter 4.

## Economy and Retail

- 6.10.16** East Herts Council’s Strategic Economic Development Advice (DTZ, 2012) suggested that the distance of the area from the M11 makes it relatively unattractive as a location for a strategic-scale business park. Even if a new northern bypass linking to a new junction 7a could be provided, the area would still be distant. In addition, a strategic business park could undermine the efforts of Harlow Council to promote the Enterprise Zone, which would have far better access to the M11 at a new Junction 7a.
- 6.10.17** The advice also considers the link between residential growth and employment: *“It is certainly the case that population growth associated with new housing growth, boosts in particular the local service sector, since a significant proportion of household income is spent locally, and population growth is accompanied by a growing requirement for schools, medical services, and increased spend in local shops and with local service providers etc which result in job growth in the locality.”*
- 6.10.18** *“...Substantial residential developments are only likely to have relatively modest local retail centres catering for the needs of the new neighbourhood.... DTZ would anticipate that any retail development as part of new residential neighbourhoods would be subject to an impact assessment to ensure that the scale of the retail provision is appropriate to the location and scale of the neighbourhood, and does not damage existing retail centres.”*
- 6.10.19** The Retail and Town Centres Update (November 2013) states that *“The potential residential development at Harlow North, comprising 10,000 new homes, could generate a requirement for around 3,000 sq.m net convenience goods floorspace, 1,500 sq.m net comparison goods floorspace and 1,900 sq.m net of non-retail service uses by 2031. This is based on the assumption that the development would seek to include retail provision to meet the day to day needs of local residents. This would absorb some of the retail capacity in other parts of the District. If taken forward it would be appropriate to direct some of the floorspace requirements for the rest of District to the Harlow North development.”*
- 6.10.20** *“If the residual floorspace requirements for East Herts cannot be accommodated within the main centres above, there may be scope to provide a larger centre within the growth location at Harlow North.”*

## Regeneration

- 6.10.21** Harlow Council has recently restated its position in relation to increased critical mass and growth to the north as achieving transformational growth of the town (Harlow Future Prospects Study – Linking Regeneration & Growth, Nathaniel Lichfield and Partners, August 2013). East Herts Council’s Strategic Economic Development Advice (2012) stated that:
- 6.10.22** *“It is worth considering whether a new development in this location would contribute to the regeneration of Harlow. While DTZ would expect that initially a relatively low proportion of new residents would work in Harlow, it is quite probable that over time the proportion would increase, as households mature, and become disenchanted with commuting, or family commitments increase; and as residents find out about local jobs that can utilise their skills and talents.”*
- 6.10.23** *“The residents of new development in this location would be likely to contain a high proportion of graduates and those with high level skills. This would help knowledge intensive businesses in Harlow to recruit; and would help to attract other knowledge based employers to the town. A new community developed in an attractive setting could be significant in changing perceptions of Harlow as a place to live; even though the developers would market the development to purchasers as being a new community in East Hertfordshire, not as an urban extension to Harlow.”*
- 6.10.24** *“DTZ conclude that, from a regeneration perspective, residential development to the north of Harlow could help realise the aspirations Harlow Council have to foster the growth of knowledge based industries in Harlow, and be part of the process of changing the perceptions and reality of Harlow which have held back economic development for many years.” (Paragraphs 7.31-7.33)*

### Transport

- 6.10.25** Transport issues are addressed in Hertfordshire County Council’s Transport Update Report (November 2013). From this it is clear that there are significant issues to be resolved in terms of the impact on the highway network. Transport modelling demonstrates that the provision of a northern bypass linking to a new junction 7a on the M11 in itself would not be sufficient to satisfactorily mitigate the impacts of development. The main issue appears to be related to the connections into and within Harlow. The modelling work has looked at a number of scenarios including the emerging proposals by the landowners/developers to upgrade the A414 and put in a second Stort Crossing which at the lower end of the range (5000) indicates that impacts would be reduced.
- 6.10.26** The Transport Update shows that although a high level of additional traffic arising from this option is predicted, further work is necessary to understand whether the transport impacts can be satisfactorily mitigated. Based upon the information presented, at present it is not possible to discount this area



of search on transport grounds. However, if at any stage impacts are considered severe and incapable of being mitigated then development would not be acceptable.

### Education

- 6.10.27** Hertfordshire County Council's schools response (September 2013) states that: *"The large scale proposed development for 10,000 dwellings at Harlow North would be expected to provide its own school infrastructure within the development, with provision for 20 f.e. of secondary school capacity. It is likely that 3 x 7 f.e. secondary schools would be needed. These could be provided as 2 x 7 f.e. schools with a reserve site to be developed as and when the additional demand arises from the development."*
- 6.10.28** If this option were to be brought forward, it would need to be fully self-contained in terms of educational provision, since this is essential to the creation of a sustainable community. The area does present the opportunity to provide schools sites to achieve this objective. Places for People's submission states that they will provide new primary schools and a secondary school and have budgeted £84 million for education.

### Delivery

- 6.10.29** In terms of delivery issues, information submitted by the developers is available at [www.eastherts.gov.uk/developerinfo](http://www.eastherts.gov.uk/developerinfo). All the information submitted has been reviewed. Three main issues for this stage in District Plan preparation relate to
- feasibility of technical solutions;
  - deliverability in financial and land terms; and
  - overall development trajectory.
- 6.10.30** ATLAS queries all three of these areas in response to the developers' questionnaire response in summer 2012.
- 6.10.31** Places for People's submission explains that it is a 'not for dividend' organisation which reinvests surpluses in the community in which they work, and are therefore different from conventional market housebuilders. The developers' expected level of return is a crucial factor on a proposal of this size with significant infrastructure costs, including their proposals for new bridges and a new sewage treatment works. In their submissions Places for People stated that their proposals can work without public subsidy despite the significant infrastructure costs. This includes significant and potentially costly commitment to very high standards of sustainability and open space provision. Viability aspects in this respect would need independent verification through further work.

- 6.10.32** However, Hertfordshire County Council's Transport Update Report shows that there remains considerable uncertainty around whether there is a deliverable transport infrastructure solution for strategic scale development in this location. The developer's transport consultants emphasise the need to assess a wide range of smaller as well as larger mitigation measures in and around Harlow. The amount of technical work which remains to be undertaken is considerable.
- 6.10.33** The developer proposes to dual/upgrade the current A414 link after the construction of around 2,000 dwellings, and by 5,000 dwellings it proposes that a second (new) Stort crossing would be put in place. However, it would be very risky to allow development to commence north of Harlow in the absence of a robust delivery plan for large-scale and long-term development. This could result in an incomplete development with significant adverse impacts on the local transport network in and around Harlow.
- 6.10.34** For these reasons East Herts Council concludes that starting any development north of the Stort before completion of a robust delivery plan and policy framework for the full extent of the development would involve significant risk of incomplete, unsustainable development which falls far short of the aspirations set out by the developers in their proposals. It is essential that the detailed feasibility and testing work should be completed in a robust manner before any development is commenced. A longer time frame would enable sufficient scrutiny and engagement not only by the authorities but also by local communities.
- 6.10.35** In relation to build-out rates, Places for People stated that it can deliver 8,500 units over a 15-year period from first residential occupancy in late 2016 to 2031, with a build-out rate starting at 250 dwellings per annum rising to 650 dwellings per annum . East Herts Council has reviewed the evidence submitted by Places for People, and does not share the optimism expressed by the developers in terms of build-out rates. Even the most rapid build rates in the country have not been sustained without substantial public sector investment across this time frame.
- 6.10.36** Whilst Places for People is the major developer interest in the area, there are others to the east and west which have also continued to express an interest in forming part of a strategic development north of Harlow. The full extent of any possible development area is unclear at this stage, and whether or not it would include some of the land submitted for consideration by these developers.

## Conclusions and Next Steps

- 6.10.37** A coherent strategy for development to the north of Harlow may be possible, although it is not without complications given the distance of the area from the M11 and the separation of the area from Harlow across the Stort valley. The main thrust of such a strategy would need to be sub-regional and have strong links to regeneration aspirations for Harlow.
- 6.10.38** Such a strategy would be complicated by local factors and deliverability. Larger-scale development in this area of search would be likely to have negative impacts on the countryside. North of the Stort, the area does not provide strong boundaries in Green Belt terms.
- 6.10.39** From the work undertaken through the Supporting Document, it is clear that there remains considerable uncertainty around the achievability and deliverability of comprehensively planned sustainable large-scale development to the north of Harlow. This will require significant further work. The main areas of focus going forward would need to be:
- **Transport:** mitigation measures, involving a combination of larger and smaller measures. Looking at the impact on the local and wider strategic network. Assessment of the cumulative impact of development in the wider Harlow area and at Bishop's Stortford and Sawbridgeworth.
  - **Financial Viability:** feasibility of delivering essential infrastructure and sustainability features, taking account of the whole 'basket' of costs and the developers' expected returns. It is expected that any definition of 'competitive returns' would reflect any policy and infrastructure requirements.
  - **Green Belt Review:** dependent on the scale and form of development as to what features could form new inner Green Belt boundaries. This is in turn dependent on the transport and financial viability assessments, and on masterplanning.
- 6.10.40** Given the strategic scale of this option, there is also the need to take account of development in other authorities, which will impact on the transport findings, viability and impact on internationally designated habitats.
- 6.10.41** Work undertaken in this Chapter reconfirms the importance of this area in terms of Harlow Council's regeneration and growth aspirations. The Duty to Co-Operate will be a major consideration and this will be addressed through the Strategy Report.

- 6.10.42** The Council would need to benefit from a considerable amount of further input from the developers and their consultant teams into the transport and viability assessments in particular, to help provide a robust evidence base to make a final decision in respect of development at this scale.
- 6.10.43** Balancing all these considerations to produce a sound strategy is a challenging task for any Local Planning Authority. East Herts Council is working with a range of partners to ensure that a robust position is identified.

## 6.11 Next Steps: Strategy Report

- 6.11.1** The Supporting Document comprises one important component of the information needed to underpin the strategy selection process for the District Plan including the choice of locations for future development. The Supporting Document presents the majority of the evidence. However, whilst the material presented to date is necessary to strategy selection, it is not in itself sufficient.
- 6.11.2** The other main component of the development strategy is the requirements of national policy, set out in the National Planning Policy Framework (NPPF). These requirements relate in particular to:
- Objective assessment of housing needs
  - The requirement to deliver a five-year housing land supply
  - Legal requirements under the Duty to Co-Operate
  - The requirement to meet housing needs within each housing market area
  - Soundness requirements for a plan which is justified, effective, and positively prepared.
- 6.11.3** A Strategy Report will be prepared for the District Planning Executive Panel on 16th January 2014 which will draw together the evidence from the Supporting Document with the national requirements of the NPPF, taking account of alternatives suggested through the Sustainability Appraisal. The Strategy Report will also address the various policy tools and options which are available in putting together the District Plan in a way which will integrate the local evidence base with national requirements.
- 6.11.4** All Local Planning Authorities must submit their draft plans to the Planning Inspectorate for Examination in Public before they can be adopted as part of the statutory development plan. The Planning Inspectorate issues reports and letters on submitted plans, which although no longer binding on Local Planning Authorities, carry significant weight as material considerations. Local Planning Authorities which choose not to accept Planning Inspectorate findings and recommendations are at significant risk of legal challenge.
- 6.11.5** The Council has carefully studied the reports and letters of the Planning Inspectorate, and the recent draft Planning Guidance. Two reports have been presented to the District Planning Executive Panel on this matter:
- 25th July 2013: District Plan Update Report. Essential Reference Paper E – Review of Planning Inspectorate Reports and Letters
  - 3rd October 2013: District Plan Update Report. Essential Reference Paper E: ATLAS Strategic Sites Deliverability Advice Note.

- 6.11.6** From this work, the Council has a robust basis on which to understand the national requirements. The Planning Inspectorate will not find sound plans which do not meet strict housing requirements. This means that the Council has to exercise caution before rejecting options which may be needed in order to meet soundness requirements. The Supporting Document cannot by itself balance evidence and requirements to produce a sound development strategy. The Strategy Report will undertake this difficult final task.
- 6.11.7** The Strategy Report will balance local evidence with the requirements of the national Planning Policy Framework (NPPF), particularly in relation to the five-year housing land supply, and the requirement to meet housing needs within the housing market area. The Strategy Report will integrate the strategic framework set out in the Supporting Document with these national requirements.