

# Settlement Appraisal

## Hertford

### 1. History

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

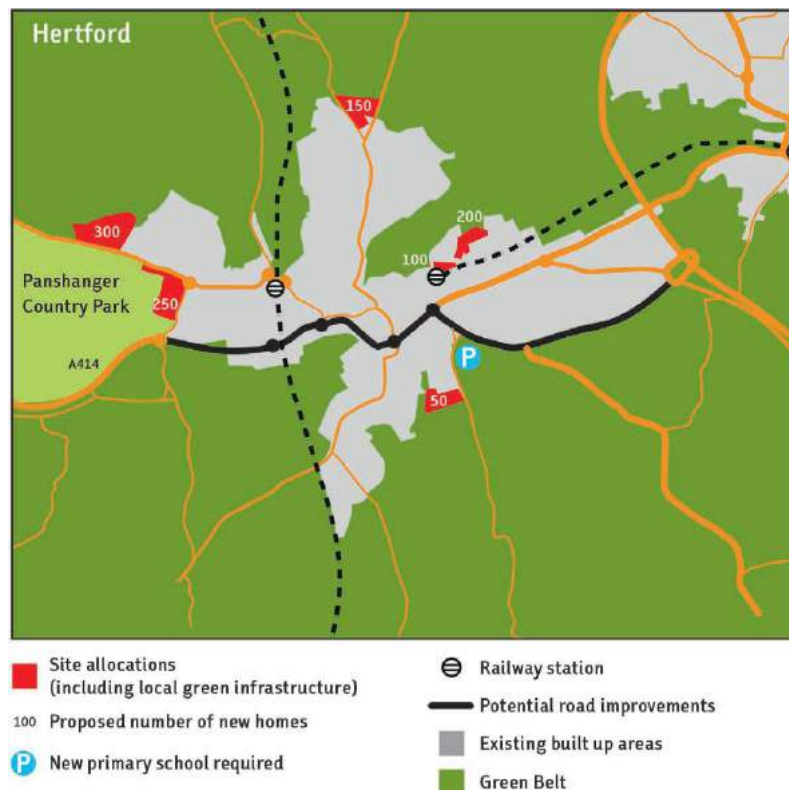


Figure 1: East Herts District Plan, Preferred Options, Hertford Key Diagram

- 1.2 The [Supporting Document](#) to the Preferred Options District Plan records the various assessment stages that were undertaken as part of the process to inform the Preferred Options version of the Draft District Plan. It therefore provides an essential background to this current Settlement Appraisal. Chapter 4 of the Supporting Document explains the process of shortlisting or 'sieving' options applied to 'Areas of Search' and their initial findings. Chapter 5 details a further appraisal stage based on option refinement.

- 1.3 Chapter 6 draws together the findings of Chapters 4 and 5 for Hertford and provides conclusions to issues considered at previous stages.
- 1.4 This document continues the narrative beyond Chapters 4 to 6 of the Supporting Document by detailing information and evidence which has emerged since the Preferred Options consultation.

## **2. Consultation Response – town-wide**

- 2.1 The Preferred Options consultation elicited a significant response from members of the local community. While these representations covered a variety of topics, the main town-wide issues which were frequently raised through comments received included:
- Hertford receiving too much growth;
  - development on Green Belt land considered to be inappropriate;
  - highway infrastructure being unable to cope with the level of development proposed;
  - insufficient school places; and
  - additional development causing harm to the character of the town.
- 2.2 Several land owners and site promoters made representations specific to their sites and further consideration of these locations is covered at appropriate points throughout the remainder of this document.
- 2.3 A full summary of the issues that were raised in respect of Hertford and the Officer proposed responses to them were considered by Members at the District Planning Executive Panel meeting on 21st July 2016. These can be viewed via the following link:  
<http://democracy.eastherts.gov.uk/ieListDocuments.aspx?CId=151&MIId=2951&Ver=4>

## **3. Technical Assessments**

### **Green Belt Review**

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

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

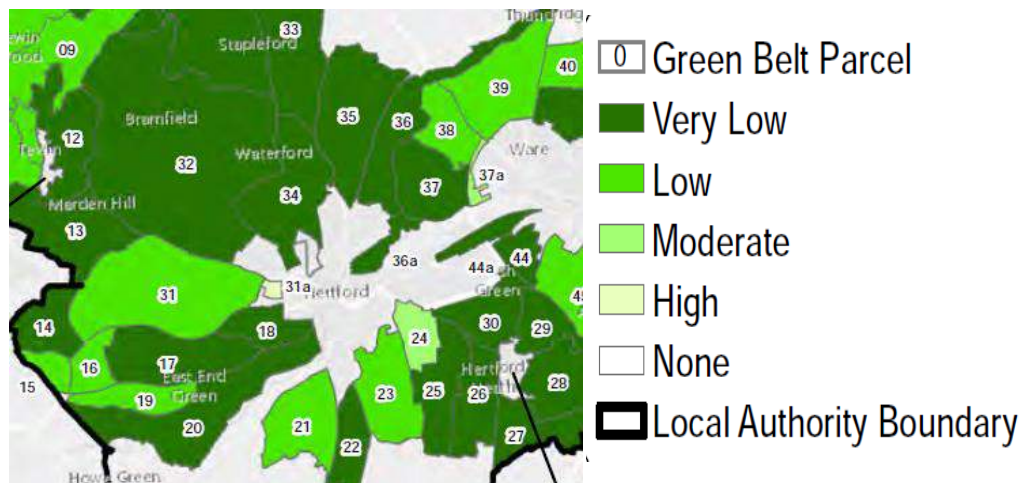


Figure 2: Conclusions of Green Belt Review 2015 for Hertford

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

### Hertford Town Centre Urban Design Strategy

- 3.4 In February 2015, Tibbalds, a leading planning and urban design consultancy, was appointed by East Herts Council, working together with Hertfordshire County Council and Hertford Town Council, to develop a Vision and Urban Design Strategy for Hertford town centre. This provided a unique, once in a generation, opportunity for consultants and all three councils serving Hertford to work together to provide a multi-faceted Strategy to influence the development and enhancement of its central core for short, medium and long-term time horizons.
- 3.5 Key elements of the study considered the future of major sites, the design and management of the street scene and transport issues for the town centre. Tibbalds' expertise was further supplemented by property, retail, transport, and landscape architectural specialists over the course of the project. The project was subject to two rounds of public consultation.
- 3.6 The purpose of the final strategy is to guide future development in Hertford's town centre. It provides a long-term coherent vision for the area, provides design approaches for key areas within the town centre, and aims to guide developers and provide a framework for determining planning applications. The Strategy further seeks to engender a sense of community and to provide opportunities that will reinforce or improve the sense of place associated with Hertford Town Centre and its environs (in line with the sustainability

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

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

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

- 3.9 The Hertford and Ware Employment Study, June 2016, was undertaken to assess the current strengths and weaknesses of the two towns and establish how they can continue to prosper through the growth of business and employment. Based on an assessment of the quality of existing sites, advice was further provided on the requirement for employment sites in the towns and also on an overall strategy for the provision of floorspace. The work was undertaken in the context of the Council's Economic Development Vision and Action Plan, March 2016, which can be viewed via the following link: <http://democracy.eastherts.gov.uk/ielIssueDetails.aspx?Ild=17408&Opt=3>.
- 3.10 The Study established that a high proportion of the working-age residents of the towns are economically active and that the towns have a relatively well qualified workforce. GSK in Ware accounts for a high proportion of overall employment floorspace. However, it is also noted that the number of jobs available in the towns has decreased by around 600 since 2009. This is contrary to the trend across the district and other benchmark areas and implies that the towns have jointly become a less important employment centre and that out-commuting is likely to have increased. When compared to benchmark authorities, the Hertford and Ware study area has the lowest office vacancy rate (1.9%), which is largely attributed to changes of use which have occurred.
- 3.11 The report notes that the current provision of employment floorspace in the towns essentially provides for the needs of local businesses and also that the towns are unable to compete for large occupiers with the floorspace in the main transport corridors (M11, A1(M) and M25). Hertford and Ware should, however, be able to compete for medium and small occupiers looking for space in south east Herts.

- 3.12 It is considered important that the Council develop a strategy for dealing with ongoing pressure to release employment sites for residential development and a key element of this involves establishing a clear housing land supply position through progression of the District Plan. Where this does not require the release of employment land, such sites should be protected. In respect of Hertford, the best existing employment site which also has capacity to accommodate further development or offer possibility for employment uses is identified as being Mead Lane. The report also introduces the potential need to plan for the provision of good quality B1 floorspace in a well accessed strategic location, potentially on the A414 or A10 road corridors.

### **Transport/Modelling**

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

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

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

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

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

The letter further confirmed that:

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

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



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

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

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

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

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

- 3.25 Beacon Planning Ltd was jointly commissioned by East Herts Council and Welwyn Hatfield Borough Council in October 2015 to prepare a Heritage Impact Assessment to consider the potential impact of development to the East of Welwyn Garden City and west of Hertford on the significance of Panshanger Park and heritage assets in the vicinity of the Park. Following the publication of each authority's Local Plan consultation in 2014 and 2015, representations made by Historic England to each consultation advised that further evidence should be gathered to take into account the significance of

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

- 3.26 The Panshanger Park is a Grade II\* Registered Park and is considered by Historic England to be most at risk from development, but other historic assets were also highlighted in the Historic England representations.
- 3.27 While the majority of the study focuses on areas closest to the proposed development at Birchall Garden Suburb, the report also makes certain observations in respect of areas of land that could be impacted by proposed development to the West of Hertford. Discussion of the findings of the Study in relation to the specific proposed site allocation area is covered in greater detail in the relevant section below. The full Study, which was published in July 2016, can be viewed via the following link: <http://www.eastherts.gov.uk/panshangerhia>.

### **Delivery Study**

- 3.28 The Delivery Study is a technical document which assesses the financial viability and deliverability of the proposals contained in the Preferred Options District Plan. While the study did not specifically assess the proposed sites in Hertford, as none of these were individually large enough to be included within strategic thresholds, it did test the financial viability of different site typologies. The study concluded that development schemes in the Hertford area that are predominantly or wholly residential in nature, should be considered financially viable when taking into account the policy requirements of the District Plan as a whole. Mead Lane may be subject to slight differences in approach, and this is discussed further below.

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

- 4.1 Several Duty to Co-operate meetings have been held at Executive Member level, involving officers, between the Council and its adjoining districts. Memoranda of Understanding are being jointly prepared to assist each council moving forward to examination. Records of meetings are published on the Council's website.
- 4.2 In relation to Hertford, matters which formed particular areas for discussion with Welwyn Hatfield Borough Council, included: the general effects of congestion on the A414 and potential effects of trip generation on the A1; and, the need to take into account Panshanger Park for any development proposals to the West of Hertford.



## **5 Neighbourhood Planning**

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

## **6 Emerging Strategy**

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

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

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

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

#### **Introduction**

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

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

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

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

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

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

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

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

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

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

### **Stakeholder Engagement**

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

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

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

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

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

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

### **Education**

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

### **Transport**

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

## **Waste Water**

- 6.27 Thames Water stated that the aim should be for development in this location to lead to a reduced flow of surface water into the foul sewer network. The site would drain to Rye Meads Sewage Treatment Works (STW) which currently serves a population catchment of over 400,000 people in the wider area.
- 6.28 A Water Cycle Study undertaken in 2008/9 forecast growth and the consequential impact on Rye Meads STW; however, the growth was not realised due to the downturn in housing development. The predicted capacity limitation dates within the study will effectively move forward; however, ongoing works to change the way the sewage is treated have provided a further period of relief to between 2021 and 2026. After that time it is likely that additional capacity provision will need to be made. Additional tanks could be provided without any extension of the Treatment Works site and without any encroachment into the adjacent SSSI.
- 6.29 In terms of site specifics, there was not anticipated to be any problems associated with foul drainage as the trunk sewer is located close to the site and there were local connections leading to it. Thames Water would reserve the right to request an impact study to confirm if any suggested point of connection would be suitable.
- 6.30 In terms of Surface Water issues, SUDs are generally favoured. Contamination on the site could have an impact in respect of discharging to the river, but the process of development may actually result in an improvement on existing conditions. A foul water sewer drainage solution should be viewed as a last option.

## **Wildlife Sites**

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

## **River**

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

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

### **Site Remediation**

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

### **Flooding**

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

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

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

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

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



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

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

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

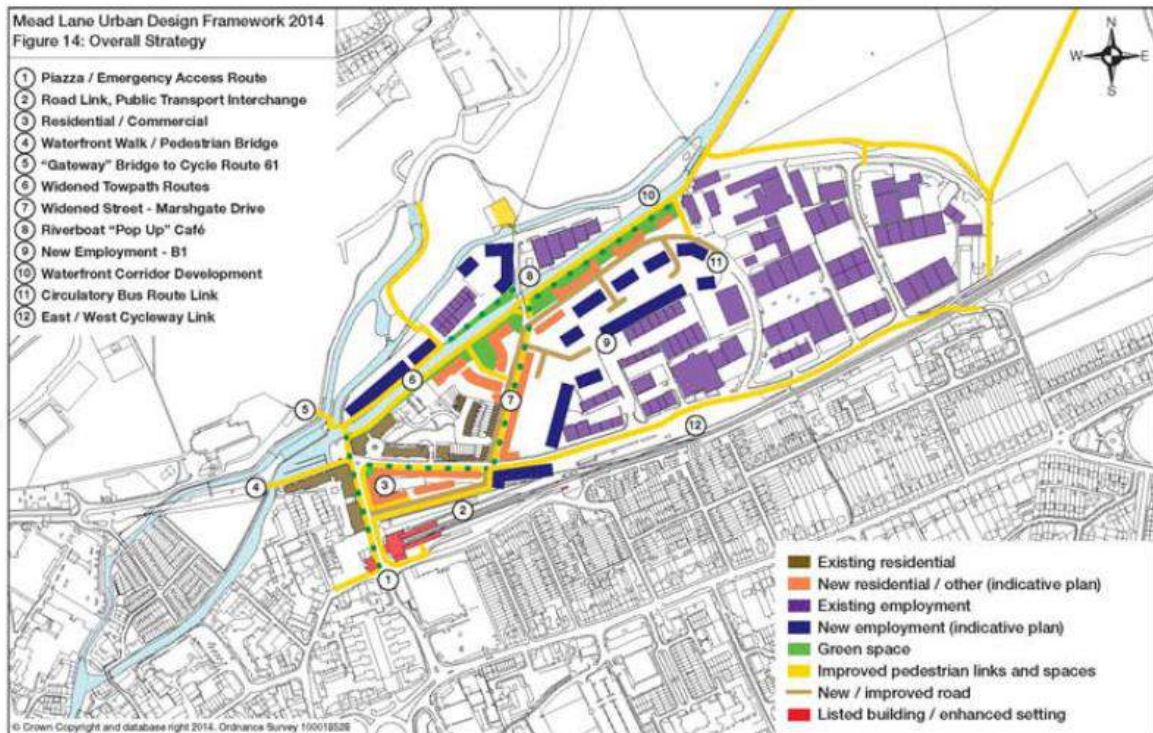


Figure 3: Mead Lane Urban Design Framework, December 2014, Overall Strategy Diagram

## Infrastructure Needs – Policy HERT2: Mead Lane Area

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

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

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

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

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

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

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

#### **Introduction**

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

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

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

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

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

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

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

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

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

6.52 Of these, parcel 31 was considered to have ‘low suitability’, and parcel 32 was considered to have ‘very low suitability’ as Areas of Search for development. The full assessment of each area can be found at pages 53 to 58 of the Green Belt Review, which can be viewed via the following link: <http://www.eastherts.gov.uk/greenbeltreview2015>, but a synopsis of each applicable parcel follows.



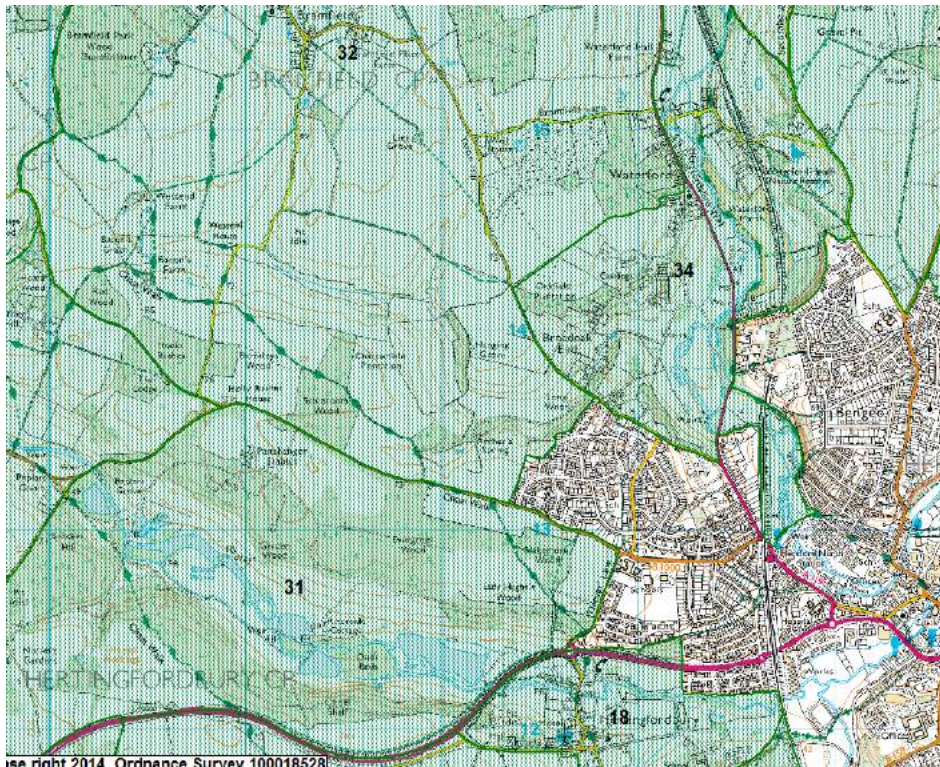


Figure 4: East Herts Green Belt Review Parcels identified by PBA for land to the West of Hertford.

- 6.53 Parcel 31 covers the area to the west of Hertford from Thieves Lane in the east to Henry Wood in the west, and B1000 Welwyn Road to the north and the A414 to the south. The Study considered that the parcel was of 'Major importance in checking the unrestricted sprawl of large built-up areas'; was of 'Major importance in preventing neighbouring towns merging'; was of 'Major importance in safeguarding the countryside from encroachment'; and made 'Slight/Negligible contribution to preserving the setting and special character of historic towns'. The parcel scored Low in terms of its overall suitability as an area of search based on its contribution to the Green Belt purposes.
- 6.54 Parcel 32 covers the area to the west of Hertford from the edge of the built up Sele Farm area in the east to far side of Bramfield Park Wood in the west, and Bramfield Woods and Row Wood to the north and B1000 Welwyn Road to the south. The Study considered that the parcel was of 'Slight/Negligible / Major (in the south eastern part) importance in checking the unrestricted sprawl of large built-up areas'; was of 'Slight/Negligible importance in preventing neighbouring towns merging'; was of 'Paramount (Moderate in area just north of Welwyn Road) importance in safeguarding the countryside from encroachment'; and made 'No contribution to preserving the setting and special character of historic towns'. The parcel scored Very Low in terms of its overall suitability as an area of search based on its contribution to the Green Belt purposes.

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

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



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

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

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

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

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

6.59 This site is currently located within the Green Belt, with the inner Green Belt boundary which is drawn tight against the built-up edge of Hertford. The East Herts Green Belt Review 2015 (Peter Brett Associates), discussed above, came to conclusions on the suitability of land in terms of overall suitability as an area of search.

#### Green Belt Conclusion

6.60 As discussed in the Development Strategy Chapter, the Council has a duty to meet its identified housing need and, due to the lack of brownfield opportunities, there is a consequential need to release some Green Belt land in order to achieve sustainable development in the district. Officers acknowledge that the assessment of the three land areas to the West of Hertford would not in itself suggest that the land contained in these parcels would be suitable for Green Belt release. However, it should be noted that the Study should be viewed in its overall context, whereby the majority of land assessed throughout the district via this process resulted in similar ratings being achieved. Therefore, of necessity, the imperative of meeting the district's housing need brings into deliberation locations that may not otherwise have been considered suitable to be brought forward for development.

6.61 Therefore, on balance, it is considered that, in order to allow for an urban extension to the sustainable settlement of Hertford (which is the second largest settlement in the district), it would be appropriate to allow some Green Belt release in this instance in order to meet identified housing need.

In this respect, it will be important to ensure that any future development can be sensitively planned to respect the most important aspects identified in the Green Belt Review in amending the town's boundaries.

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

- 6.62 As detailed earlier in this Settlement Appraisal, HCC Highways have reviewed their position in relation to development in Hertford as more up to date evidence, particularly in respect of impact on the A414, has become available.
- 6.63 It is now the case that there is no in-principle objection to development of up to 550 dwellings in this location at a strategic scale. However, detailed matters pertaining to access and the potential need to contribute to wider strategic improvements to mitigate impact of development remain to be addressed through the planning application process. It is not considered at this stage that any matters would prove to be of particular concern.

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

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

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

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

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

- 6.66 Due to its location within the Sand and Gravel belt, HCC, in its capacity as Minerals and Waste Authority, would not support the sterilisation of this asset through built development if the depth and quality of any underlying mineral deposits would result in extraction being economically viable. There may be opportunity to utilise any gravel extracted in the construction process on site. There would therefore be a requirement for further investigative work through the planning process.

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

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

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

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

### Wildlife – Policy HERT3: West of Hertford

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

#### *58/025 Panshanger Park*

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

59/077 Land West of Sele Farm

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

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

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

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

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

**Education**

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

## **Community Facilities**

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

## **Healthcare**

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

## **Minerals and Waste**

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

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

## **Highways**

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

## **Passenger Transport**

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

## **Waste Water**

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

capacity limitation dates within the study will effectively move forward; however, ongoing works to change the way the sewage is treated have provided a further period of relief to between 2021 and 2026. After that time it is likely that additional capacity provision will need to be made. Additional tanks could be provided without any extension of the Treatment Works site and without any encroachment into the adjacent SSSI.

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

### **Wildlife Sites**

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

### **Developer Meetings and Information**

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

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

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





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



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

## **Infrastructure Needs**

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

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

## **Implementation**

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

## **Policy HERT4: North of Hertford**

### **Introduction**

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

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

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

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

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

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

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

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

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

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



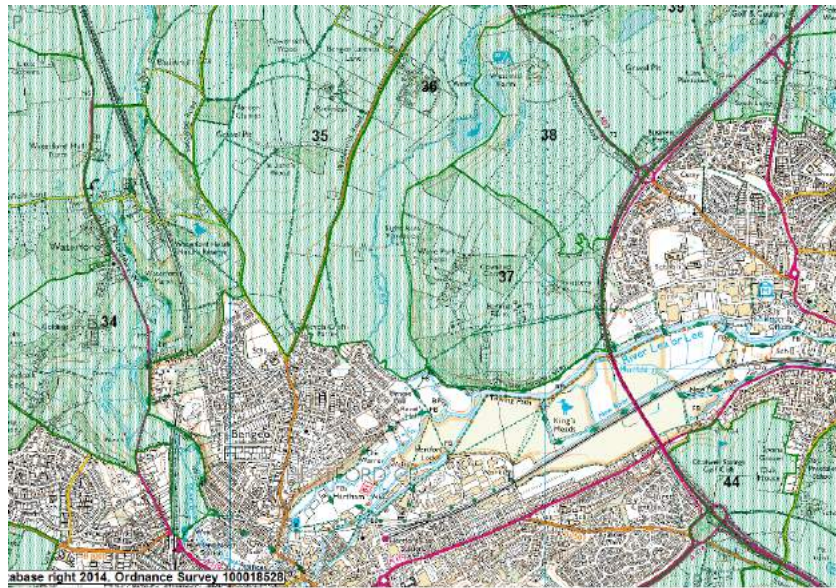


Figure 7: East Herts Green Belt Review Parcels identified by PBA for land to the North of Hertford

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

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

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

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

### Green Belt Conclusion

- 6.104 As discussed in the Development Strategy Chapter, the Council has a duty to meet its identified housing need and, due to the lack of brownfield opportunities, there is a consequential need to release some Green Belt land in order to achieve sustainable development in the district. Officers acknowledge that the assessment of the land parcel to the North of Hertford would not in itself suggest that, beyond the nursery site, the land contained in this parcel would be suitable for Green Belt release. However, it should be noted that the Study should be viewed in its overall context, whereby the majority of land assessed throughout the district via this process resulted in similar ratings being achieved. Therefore, of necessity, the imperative of meeting the district's housing need brings into deliberation locations that may not otherwise have been considered suitable to be brought forward for development.

- 6.105 Furthermore, as the landform in this area could be subject to change if mineral extraction occurs in this location, then circumstances would allow for the creation of a strong Green Belt boundary.
- 6.106 Therefore, on balance, it is considered that, in order to allow for an urban extension to the sustainable settlement of Hertford (which is the second largest settlement in the district), it would be appropriate to allow some Green Belt release in this instance in order to meet identified housing need. In this respect, it will be important to ensure that any future development can be sensitively planned in amending the town's boundaries.

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

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

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

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

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

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



## Minerals – Policy HERT4: North of Hertford

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

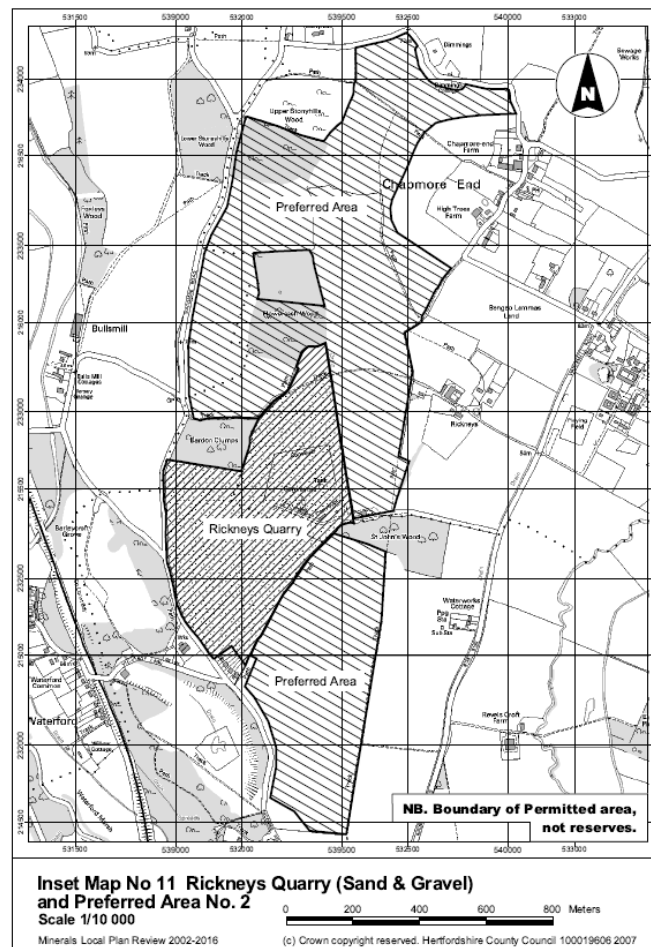


Figure 8: Minerals Local Plan 2007, Preferred Area No.2

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

### Minerals Conclusion

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

### Heritage Assets – Policy HERT4: North of Hertford

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

### Wildlife – Policy HERT4: North of Hertford

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

#### *59/015 Great Mole Wood*

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

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

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

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

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

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

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

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

### **Education**

- 6.124 At the point of the 2014 meeting, which was prior to the finalisation of plans and subsequent opening of the all-through school facility at Simon Balle, in respect of primary provision, HCC identified that the Simon Balle expansion would be required to support the pupil yield of the existing community.
- 6.125 Therefore, it was likely that development to the north of Hertford would generate additional need for educational provision. Expansion of Bengoe school could be investigated, but was not able to be confirmed at that time.
- 6.126 Contributions would be expected from developers towards primary and secondary education.

### **Highways**

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

## **Passenger Transport**

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

## **Waste Water**

- 6.129 The site would drain to Rye Meads Sewage Treatment Works (STW) which currently serves a population catchment of over 400,000 people in the wider area.
- 6.130 A Water Cycle Study undertaken in 2008/9 forecast growth and the consequential impact on Rye Meads STW; however, the growth was not realised due to the downturn in housing development. The predicted capacity limitation dates within the study will effectively move forward; however, ongoing works to change the way the sewage is treated have provided a further period of relief to between 2021 and 2026. After that time it is likely that additional capacity provision will need to be made. Additional tanks could be provided without any extension of the Treatment Works site and without any encroachment into the adjacent SSSI.
- 6.131 In terms of site specifics, it was explained that the sewerage would move down the hill to the River Lea connection where the sewerage system is already stressed. There are some problems near to the river in terms of flooding but in general the existing system would be adequate. Modelling would be required to be undertaken to ascertain what improvements to the system would be required.

## **Minerals and Waste**

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

## **Wildlife Sites**

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

## Developer Meetings and Information

- 6.134 Since the Partnership Group Meeting, two meetings have taken place with site promoters. These were largely to discuss matters pertaining to mineral extraction and Green Belt boundary issues. Communication has been ongoing in respect of exchange of appropriate information between site promoters and the Council.
- 6.135 The need to prepare Statements of Common Ground for Examination purposes has been agreed with both sub-site promoters and these will continue to be progressed.

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

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



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

## Infrastructure Needs

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

- Affordable Housing ;

- mineral extraction requirements
- new utilities, including, inter alia: integrated communications infrastructure to facilitate home working;
- upgrades to the sewerage system;
- sustainable drainage and provision for flood mitigation;
- local highways mitigation measures(with contributions towards wider, strategic, measures);
- sustainable transport measures, both through improvements to existing bus services, walking, cycling and bridleway networks in the locality and through new provision, which should also provide links with the adjoining area and the town centre;
- public open spaces across the site, including the provision of play areas and opportunities for outdoor health and fitness activities, as well as space for wildlife;
- quality local green infrastructure through the site including opportunities for preserving and enhancing on-site assets, maximising opportunities to link into existing assets and enhance biodiversity;
- measures to ensure that any impact on wildlife within the site and at the nearby Waterford Heath nature reserve is successfully mitigated;
- all necessary on-site and appropriate off-site infrastructure.

## **Implementation**

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

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

### **Introduction**

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

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

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

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

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

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

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

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

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

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







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

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

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

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

### Green Belt Conclusion

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

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

- 6.151 Hertford benefits from having 'Green Fingers' that are aligned with the routes of the four rivers (and their associated wetlands) which penetrate the built-up area of the County town. Hertford Civic Society has produced two reports on these valuable resources, in 1976 and 2004. East Herts Council has long supported the protection of these unique assets, particularly through local planning policy approach. While recognising that the Inspector's Report to the last Local Plan Inquiry deleted the then proposed policy in the currently adopted Local Plan, 2007, and further questioned a formal designation when other national policies would offer the necessary level of protection, the currently adopted Proposals Map was able to retain the designation for that plan period.
- 6.152 Since that time, the NPPF has introduced a new policy allowing local communities to identify green areas of particular importance to them for special protection, by designating land as 'Local Green Space'. This policy allows protection of such areas with development only occurring where very special circumstances apply. Taking all of this into account, the District Plan proposes that the Green Fingers will no longer have their own named designation, but rather (along with areas in Bishop's Stortford) will receive continued protection via Policy CFLR2 Local Green Space and these areas will be denoted as such on the Policies Map.

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

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

- 6.154 As detailed earlier in this Settlement Appraisal, HCC Highways has reviewed its position in relation to development in Hertford as more up to date evidence, particularly in respect of impact on the A414, has become available.
- 6.155 HCC has confirmed that there is no in-principle objection to development of 50 dwellings in this location. However, it should be noted that detailed matters pertaining to access and the potential need to contribute to wider strategic improvements to mitigate impact of development remain to be addressed through the planning application process. It is not considered at this stage that any such matters would prove to be of particular concern.

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

- 6.156 There are no listed buildings lying directly within the overall site area, but Grade I Balls Park and its Grade II Registered Garden is located within close proximity.
- 6.157 The HERT5 area currently lies within the Hertford Conservation Area; however, this part is under review with a public consultation recently concluded. Therefore, dependent on the Council's final consideration of matters raised, this designation may be subject to change in the future
- 6.158 The HERT5 policy area would therefore need to ensure that these heritage assets are fully taken into account and respected in development proposals.

## Wildlife – Policy HERT5: South of Hertford

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

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

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

### 59/111 Valley Close Area

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

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

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

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

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

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

## **Education**

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

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

### **Transport**

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

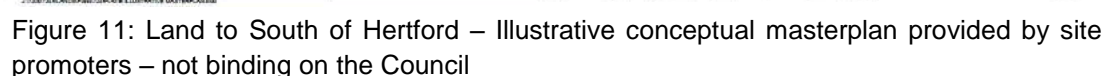
### **Waste Water**

- 6.167 Whilst Thames Water was unavailable to be represented at the meeting, it was confirmed post meeting the site would drain to Rye Meads Sewage Treatment Works (STW) which currently serves a population catchment of over 400,000 people in the wider area
- 6.168 The Water Cycle Study that was undertaken in 2008/9 had previously forecast growth and the consequential impact on Rye Meads STW; however, the growth was not realised due to the downturn in housing development. The predicted capacity limitation dates within the study will effectively move forward; however, on-going works to change the way the sewage is treated have provided a further period of relief to between 2021 and 2026. After that time it is likely that additional capacity provision will need to be made. Additional tanks could be provided without any extension of the Treatment Works site and without any encroachment into the adjacent SSSI. However, it is important to note that the overall impact and treatment requirement could not be fully predicted at that time as the cumulative effects of development from all the adjacent local authority areas also served by Rye Meads was not fully defined.

### **Developer Meetings and Information**

- 6.169 At the date of writing, no meetings have been held with site promoters since the Partnership Group Meeting. However, communication has been ongoing in respect of exchange of appropriate information between site promoters and the Council.
- 6.170 The need to prepare a Statement of Common Ground for Examination purposes has been agreed with the site promoter and this will continue to be progressed.

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



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

- Affordable Housing;
- mineral extraction requirements;
- new utilities, including, inter alia: integrated communications infrastructure to facilitate home working;
- local highways mitigation measures (with contributions towards wider, strategic, measures);
- sustainable transport measures, both through improvements to the existing walking and cycling networks in the locality and through new provision, which should also provide links with the adjoining area and the town centre (including, inter alia, an upgraded pedestrian and cycle way along Mangrove Road to Simon Balle School) and enhanced passenger transport services;
- public open spaces across the site, including the provision of play areas and opportunities for outdoor health and fitness activities, as well as space for wildlife;

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

## Implementation

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

## 7 Consideration of Alternative Sites

- 7.1 As part of the Plan-making process it has been necessary to consider whether any available and suitable alternative options would be better placed to meet the level of development proposed to be delivered in Hertford in the areas to the West, North and South of the town (N.B. As the Mead Lane policy area is a brownfield site located within the urban area and already covered by an extant policy within the 2007 Adopted Local Plan, it is not intended that an alternative for this site should be explored).
- 7.2 Assuming that land in these locations would be suitable in principle for development, it is also necessary to consider whether there would be any alternative location/s in and around the town of Hertford which would have the ability to better accommodate a similar amount of development that these sites would deliver (i.e. 750 dwellings). The Strategic Land Availability Assessment (SLAA) is considered to be the most appropriate mechanism to establish land which may be available at other locations (either singly or cumulatively) in the immediate Hertford area and the forms of development proposed.
- 7.3 Therefore, the following section considers those sites submitted through the Call for Sites process for residential or mixed uses, which were: large enough to meet the 0.25ha threshold, as identified by national policy; not already subject to the grant of planning permission (and would therefore count as commitments); or already included within the proposed allocated site areas. The sites have been listed below in the order in which they appear in the SLAA, and should not be viewed as being in any order of importance. It should be noted that Members may have already taken some of these sites into consideration through agreement of the Officer responses to the Preferred Options consultation at the District Planning Executive Panel held on 21<sup>st</sup> July 2016.

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

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

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

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

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

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

### **03/007 – The Old Orchard.**

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

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

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

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

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

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

### **03/016 – 1-14 Dicker Mill.**

- 7.13 This area of land, which is proposed for residential development, comprises 0.45ha and is a brownfield site located within the settlement boundary, adjacent to the River Lea. The site is designated as part of the Mead Lane Employment Area. While it is proposed that part of the Mead Lane area be brought forward for development as part of the District Plan, that particular area is largely a long-vacant, dilapidated site where the provisions of the Mead Lane Urban Design Framework seek to regenerate this key location.
- 7.14 Given the highway access constraints of the area and the limitations to additional vehicle movements in the area, development proposals need to be within the thresholds dictated within the Mead Lane section of the Hertford and Ware Urban Transport Plan. Consequently, redevelopment of the Dicker Mill site for residential purposes would likely be at the expense of development in the Mead Lane Urban Design Framework area, and thus would potentially compromise the viability of that area and its potential to bring forward significant sustainable transport initiatives into the area.
- 7.15 Furthermore, the findings of the Hertford and Ware Employment Study, conclude that, where not required for release to meet housing need,



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

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

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

#### **03/019 – Goldings Manor**

- 7.17 This site comprises 40.47ha proposing a residential, community, leisure/recreation, employment, mixed use development in the grounds of Goldings, which lies within Area of Search 12, Sub-Area A, which failed the first stage of sieving process and was not carried forward to latter assessment stages.
- 7.18 Not only does this large greenfield site form part the Goldings Estate Historic Park and Garden it is also poorly related to the village of Waterford. The majority of the site is identified as an area of protected open space and the total area is located within the Green Belt. As such Officers consider that this area is unsuitable for development.

#### **03/020 – Land at Braziers Field**

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

#### **03/021 – Goldings, Orchard House**

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

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

#### **03/022 – Chelmsford Lodge**

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

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

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

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

- 7.24 This area of 2.76ha is a greenfield site located within the Green Belt to the south of Hertford and to the west of Mangrove Road. While the site is reasonably well related to the existing settlement, development would extend the ribbon of development along Mangrove Road. In addition, development of the western half of the site would extend beyond the current urban form and would harm the character of the Green Finger. As such, the site is considered to be unsuitable for development and Officers do not support it as an allocation.

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

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

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

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

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

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

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

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

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

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

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

- 7.32 This brownfield site of 2.9ha is located within the settlement boundary and is proposed for residential use. The site is a designated Employment Area and forms a key part of the local employment offer. It is also located adjacent to the Foxholes Business Park, which consolidates the employment offer in this area.
- 7.33 The findings of the Hertford and Ware Employment Study, June 2016, conclude that, where not required for release to meet housing need, remaining Employment Sites in the towns should be protected. It is therefore the view of Officers that the site is unsuitable for residential development.

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

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

## **8 Employment**

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

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

## **9 SA Objectives**

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

## ***Air Quality***

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

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

- 9.3 Only one of the proposed four allocations is directly affected by the presence of wildlife sites (West of Hertford – as detailed above), although other allocations have designated sites of environmental importance in proximity to these locations. While development of greenfield sites does impact on biodiversity, this can be mitigated to some extent through the provision of green spaces and substantial planting to form buffers and new Green Belt boundaries.

## ***Community and Wellbeing***

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

## ***Economy and Employment***

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

## ***Historic Environment***

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

## ***Housing***

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

## ***Land***

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

## ***Landscape***

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

## ***Low Carbon Development***

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



## ***Transport***

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

## ***Water***

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

## **10 Conclusion**

- 10.1 The Settlement Appraisal for Hertford has demonstrated that, having considered all the reasonable alternatives, four sites should be proposed for allocation within the District Plan in order to deliver a total quantum of approximately 950 new homes.
- 10.2 Three sites of the four site allocations are currently located within the Green Belt. However, a carefully planned review of Green Belt in East Herts is considered justified by the significant level of housing need that exists across the District. In the case of Hertford, the three proposed sites are considered to be the most preferable, taking into consideration sustainability and Green Belt criteria in addition to impact on the unique 'Green Finger' assets.
- 10.3 All four sites will provide a range of housing mix and tenures, including affordable housing. Development will also contribute financially to enhanced education and health services in the town. Improvements to local road junctions will help to mitigate the impact of increased traffic, while sustainable transport options will be delivered as part of development proposals for the Mead Lane site and those to the West and North of Hertford.

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