

Appendix 3 – PAS Local Plan Route Mapper Toolkit: Local Plan Review Assessment

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A	PLAN REVIEW FACTORS		
A1.	The plan policies still reflect current national planning policy requirements.	Disagree	Appendix 2 demonstrates that whilst a number of the policies in the District Plan 2018 generally accord with national policy and guidance, many do not and will require updating to reflect either a national policy change or a local change in circumstance.
A2.	There has not been a <u>significant</u> change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).	Disagree	<p>Appendix 4 considers changes to local housing need.</p> <p>Paragraph 62 of the NPPG states that local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method.</p> <p>The District Plan requirement is for 839 dwellings per annum. The current local housing need set by the standard method is for 1,112 dwellings per annum. This represents a 33% increase and is deemed to be a significant change to local housing need.</p>

<p>A3.</p>	<p>You have a 5-year supply of housing land</p>	<p>Disagree</p>	<p>Following a hearing session in December 2022, an Inspector concluded that the Council is unable to demonstrate a five year housing land supply (5YHLS) of deliverable sites. In particular, the Inspector questioned the deliverability of the Council’s anticipated supply of housing, setting out specific concerns about the following four sites:</p> <ul style="list-style-type: none"> - GA1: The Gilston Area - HERT3: West of Hertford (Archers Spring) - EWEL1: East of Welwyn - WARE2: North and East of Ware <p>The Inspector concluded that no development from these sites should be included in the five year supply, thereby reducing the overall supply by 1,800 dwellings, leading to a 760 dwelling shortfall. This results in the Council only having 4.41 years of supply.</p> <p>The Council’s Planning Policy Team will be considering the latest housing completions data and will use this, alongside other evidence, to review the land supply position. This offers the best opportunity for the Council to comprehensively address the appeal Inspector’s concerns.</p>
<p>A4.</p>	<p>You are meeting housing delivery targets</p>	<p>Agree</p>	<p>The Council has continued its trend of annual improvements on the Housing Delivery Test. The last Housing Delivery Test result showed that the Council was able to demonstrate a 130% delivery rate.</p>

<p style="text-align: center;">A5.</p>	<p>Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets including requirements for First Homes; and (ii) commercial floorspace/jobs targets over the remaining plan period.</p>	<p>Disagree</p>	<p>i) affordable housing targets including requirements for First Homes</p> <p>The East Herts District Plan sets out the affordable housing need and targets in Table 14.1 (page 182) over the period 2011-2033, of 217 dwellings per annum.</p> <p>Work commissioned in 2021 and completed in 2022 concluded that the annual need for affordable housing in East Herts had risen since the District Plan was adopted. The work concluded that there was a total need of 3,784 affordable dwellings over the period 2021-2033, or 315 per annum. It should be noted that this increase in growth is largely due to the shorter period to address the backlog of need alongside the introduction of those aspiring to own being considered as potentially being in affordable housing need.</p> <p>When looking at the annual delivery rates of affordable housing, it is clear that since the adoption of the District Plan in 2018, a significant increase in affordable completions has followed which is demonstrated in the table below. However, the table also demonstrates that the net affordable completions have fallen short of the average affordable dwellings target since the start of the plan period.</p> <table border="1" data-bbox="1182 1134 2063 1374"> <thead> <tr> <th>Year</th> <th>Net Affordable Completions</th> </tr> </thead> <tbody> <tr> <td>11/12</td> <td>124</td> </tr> <tr> <td>12/13</td> <td>196</td> </tr> <tr> <td>13/14</td> <td>68</td> </tr> <tr> <td>14/15</td> <td>125</td> </tr> </tbody> </table>	Year	Net Affordable Completions	11/12	124	12/13	196	13/14	68	14/15	125
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The District Plan 2018 does not include a policy on First Homes.

(ii) commercial floorspace/jobs targets over the remaining plan period.

Whilst further work will need to be undertaken to establish the exact delivery of jobs/employment land targets, it is clear that employment floorspace has continued its trend of a net decrease since the District Plan has been adopted.

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<p>A6.</p>	<p>There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.</p>	<p>Disagree</p>	<p>There have been some significant changes in economic conditions that will need to be taken into account. These include the impact of the pandemic and changes to the use classes order that allows for commercial premises (business and retail) to change to housing without the need for planning permission.</p> <p>Historic evidence suggests that there has been a steady decline of employment space in East Herts, and existing employment areas continue to come under pressure to redevelop to other uses.</p>																

			Updated economic evidence will be required to assess jobs growth and projections, and other opportunities for business growth across the district.
A7.	There have been no significant changes affecting viability of planned development.	Disagree	<p>It is acknowledged that there are currently macro-events and trends that could affect the viability of delivering developments such as the increasing cost of materials and labour shortages.</p> <p>Whilst the direct impact of the above on the viability of planned development is difficult to determine, there are local examples of site allocations demonstrating viability issues. For example, the Gilston Area allocation for 10,000 homes is unlikely to reach policy-compliant levels of affordable housing due to viability reasons. Likewise, the submitted application at HERT3 has experienced delays in determination directly linked to viability issues.</p> <p>Delays to brownfield developments could be viability linked; HERT2 was granted permission in 2020 but aside from a material start on site there have been no completions and work has largely stalled for over a year.</p>
A8.	Key site allocations are delivering, or on course to deliver, in accordance the local plan policies meaning that the delivery of the spatial strategy is not at risk.	Agree/ Disagree	<p>Twelve of the allocated sites in the District Plan have been granted planning permission and development is in progress. In terms of the remaining sites, an update on each one is provided below:</p> <p>BISH6 - Bishop's Stortford High School, has a resolution to grant permission subject to the signing of a Section 106 Agreement, which is in final draft and will be issued shortly. This is an outline planning application for up to 223 dwellings including the demolition of existing buildings.</p>

BISH8 - Land at Old River Lane, does not currently have planning permission. An outline planning application has been submitted for up to 225 dwellings and will be determined by the Development Management committee in due course (committee date to be agreed).

HERT3 - West of Hertford (Archers Spring), does not currently have planning permission. An outline application has been submitted for 342 dwellings and will be determined by the Development Management Committee in due course (committee date to be agreed).

HERT4 - North of Hertford (West of Wadesmill Road), does not currently have planning permission. A planning application for 118 dwellings has been submitted and will be determined by the Development Management Committee in due course (committee date to be agreed).

SAWB4 - Land North of Sawbridgeworth, has a resolution to grant permission subject to the signing of a Section 106 Agreement. This is hybrid planning application for full permission for 85 dwellings and outline permission for 99 dwellings.

WARE2 - Land North and East of Ware, does not currently have planning permission. A hybrid planning application has been submitted including outline permission for 1,800 dwellings and will be determined by the Development Management Committee in due course (committee date to be agreed).

GA1 - The Gilston Area, has a resolution to grant outline planning permission subject to the signing of Section 106 Agreements. This

			<p>relates to two separate permissions, one for 8,500 dwellings (Villages 1-6), and the second for 1,500 dwellings (Village 7).</p> <p>EWEL1 - East of Welwyn Garden City, does not currently have planning permission. An outline planning application for 1,350 homes in East Herts District and 1,300 homes in Welwyn Hatfield Borough has been submitted and will be determined by each Council's Development Management Committee in due course (committee date/s to be agreed).</p> <p>This means that the District Plan housing trajectory is being delivered broadly in line with what was anticipated in 2018; however, as the Council cannot currently demonstrate a 5-year housing land supply, there may be a need to identify additional sites to ensure an adequate supply of housing (see A3. above).</p>
<p>A9.</p>	<p>There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.</p>	<p>Disagree</p>	<p><u>Climate Change</u> - The importance of tackling climate change has risen in the national agenda since the adoption of the District Plan in 2018. In 2019 the Government amended the Climate Change Act to commit the UK to net zero greenhouse gas emissions by 2050. Subsequently, changes to the building regulations came into force in June 2022, which require new homes to reduce carbon emissions by 30% and non-domestic buildings to reduce emissions by 27%.</p> <p>The Council has recently made a declaration of climate emergency (Council, 26th July 2023) and it has become clear that action to mitigate against climate change and adapt to its impacts must be embedded and integrated into all aspects of policy preparation, including through a review of the District Plan.</p>

			<p><u>Flood Risk</u> - Any change to strategic policies and proposals, including to site allocations, will need a revised Strategic Flood Risk Assessment (SFRA) and application of the sequential approach.</p> <p><u>Improvements to the Environment</u> - The update to the NPPF in 2021 emphasised the importance of trees for enhancing the quality and character of the urban area and addressing climate change. Paragraph 131 states that planning policies and decisions should ensure that streets are tree lined and that opportunities are taken to ensure trees are incorporated elsewhere in developments.</p> <p><u>Biodiversity</u> - The Environment Act in 2021 introduced a mandatory requirement for biodiversity net gain. Development proposals will need to deliver a minimum 10% net gain using a biodiversity metric and approval of a biodiversity net gain plan. This will start to come into force for some planning applications from November 2023.</p> <p><u>Sustainability Appraisal</u> - The SA will need to be reviewed against any new District Plan objectives. The SA will also require updating if housing numbers and distribution needs change. New sites will also need to be assessed.</p>
<p>A10.</p>	<p>No new sites have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.</p>	<p>Agree</p>	<p>Delivery of the development strategy set out in the District Plan has ensured that planning in East Herts has been genuinely 'plan led' over the last five years, which will have significantly reduced the number of speculative developments coming forward.</p>

			<p>It will be important that the District Plan continues to provide a clear framework for addressing the district's housing needs and other economic, social, and environmental priorities.</p>														
<p>A11.</p>	<p>Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.</p>	<p>Agree</p>	<p>Policy DPS4 Infrastructure Requirements sets out the key planned infrastructure requirements to support the levels of growth required – the table below assesses their progress and current status:</p> <table border="1" data-bbox="1182 491 2063 1026"> <thead> <tr> <th data-bbox="1182 491 1621 536">Project</th> <th data-bbox="1621 491 2063 536">Progress</th> </tr> </thead> <tbody> <tr> <td data-bbox="1182 536 1621 576">a) New Junction 7a on M11</td> <td data-bbox="1621 536 2063 576">Completed</td> </tr> <tr> <td data-bbox="1182 576 1621 699">b) Upgrades to Junction 7 and 8 of M11</td> <td data-bbox="1621 576 2063 699">Junction 8 under construction due to be complete autumn 2023</td> </tr> <tr> <td data-bbox="1182 699 1621 858">c) Widening of existing River Stort crossing, provision of a second</td> <td data-bbox="1621 699 2063 858">Permission granted for both the widening of the existing crossing, and the provision of the new crossing</td> </tr> <tr> <td data-bbox="1182 858 1621 943">d) Provision of Hertford bypass</td> <td data-bbox="1621 858 2063 943">Solution not identified</td> </tr> <tr> <td data-bbox="1182 943 1621 983">e) Little Hadham bypass</td> <td data-bbox="1621 943 2063 983">Completed</td> </tr> <tr> <td data-bbox="1182 983 1621 1026">f) Upgrades to A602</td> <td data-bbox="1621 983 2063 1026">Completed</td> </tr> </tbody> </table> <p>Other infrastructure required to support development has also been delivered or will be delivered, including:</p> <ul style="list-style-type: none"> - upgrades to rail network - measures to facilitate sustainable transport - new schools and the expansion of existing schools - healthcare facilities - broadband telecoms 	Project	Progress	a) New Junction 7a on M11	Completed	b) Upgrades to Junction 7 and 8 of M11	Junction 8 under construction due to be complete autumn 2023	c) Widening of existing River Stort crossing, provision of a second	Permission granted for both the widening of the existing crossing, and the provision of the new crossing	d) Provision of Hertford bypass	Solution not identified	e) Little Hadham bypass	Completed	f) Upgrades to A602	Completed
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			<p>- upgrades to wastewater and water supply</p> <p>In 2022/23 alone nearly £3-million of S.106 money was allocated to individual projects or uses across the district.</p> <p>Further information on infrastructure delivery is available in the Council's Annual Infrastructure Delivery Statements - https://www.eastherts.gov.uk/about-east-herts-0/east-herts-annual-infrastructure-funding-statements.</p>
<p>A12.</p>	<p>All policies in the plan are achievable and effective including for the purpose of decision-making.</p>	<p>Disagree</p>	<p>Appendix 2 considers the individual policies in the Plan and identifies where updates are required based on either local changes and/or national policy changes.</p> <p>In some cases, the need to update is due to the effectiveness of the policy since its adoption. This mainly relates to the Development Management policies, where a number of them would benefit from an update following lessons learnt across a number of years of decision-making.</p> <p>Similarly, where a national policy change has occurred some policies have become outdated or are now in conflict with the NPPF; again, an update would benefit the effectiveness of these policies.</p> <p>Where issues have been identified and Development Management colleagues have reported them, this information has been included in the commentary within Appendix 2 accompanying the relevant policy.</p>

<p>A13.</p>	<p>There are no recent or forthcoming changes to another authority's development plan or planning context which would have a material impact on your plan / planning context for the area covered by your local plan.</p>	<p>Agree</p>	<p>Appendix 1 summarises the Duty to Co-operate discussions that have been held to date with key stakeholders.</p> <p>There are currently no identified matters that would have a material impact on the planning context for the district. This will be kept under review.</p>
<p>A14.</p>	<p>There are no local political changes or a revised / new corporate strategy which would require a change to the approach set out in the current plan.</p>	<p>Disagree</p>	<p>The political make-up of East Herts Council changed substantially in May 2023. The new-Joint Administration may have a different approach or objectives and likewise may wish to incorporate their manifesto commitments into any update.</p> <p>A Corporate Plan was agreed in 2020 and whilst the District Plan doesn't necessarily conflict with the objectives of this Plan, it does not contain reference to it or directly support its objectives. Furthermore, it is anticipated that a new Corporate Plan will be prepared by the Joint Administration.</p> <p>Key partners and departments have also adopted or agreed a number of strategies and plans in the intervening years since the District Plan was adopted. For example, the East Herts Housing Strategy 2022-27 and the Homelessness Review and Strategy 2019-2024 were both agreed following the District Plan adoption.</p>

	ASSESSING WHETHER OR NOT TO UPDATE YOUR PLAN POLICIES	YES/NO (please indicate below)	
A15.	You AGREE with <u>all</u> of the statements above	NO	If no go to question A16.
A16.	You DISAGREE with one or more of the statements above and the issue can be addressed by an update of local plan policies	YES	If yes, based on the above provide a summary of the key reasons <u>why</u> an update to plan policies is necessary in section A17 below and complete Section B below.
A17.	<p><u>Decision:</u> Update plan policies</p> <p>Reasons for decision on whether or not to update plan policies:</p> <ul style="list-style-type: none"> • The significant change in local housing need arising from the standard method (see Appendix 4 for more information). • The potential requirement to identify new sites for development to ensure that the Council can demonstrate a five year housing land supply. • The ongoing requirement to address affordable housing targets which have increased since the District Plan was adopted in 2018. • The need to maximise opportunities for jobs growth and to take account of changing economic circumstances. • Changes in the environmental context including the Council's declaration of climate emergency and the requirement for biodiversity net gain. • A number of the development management policies will also need clarification and updating to reflect changes in national policy/local changes, including the requirement to draw up design codes and guidance. 		

	B. POLICY UPDATE FACTORS	YES/NO (please indicate below)	Provide details explaining your answer in the context of your plan / local authority area
B1.	Your policies update is likely to lead to a material change in the housing requirement which in turn has implications for other plan requirements / the overall evidence base.	YES	The housing need for East Herts has changed from the currently adopted District Plan-figure of 839, to the standard method derived figure of 1,112. This represents a 33% increase and is deemed to be significant change to local housing need.
B2.	The growth strategy and / or spatial distribution of growth set out in the current plan is not fit for purpose and your policies update is likely to involve a change to this.	YES/NO	<p>A change to the housing requirement does not necessarily mean that there is a need for a change to the spatial strategy. However, this cannot be concluded until a full assessment of the implications of the increase on the longevity of the development strategy have been considered, alongside the consequences of an extended plan-period.</p> <p>Likewise, the ability of the Council to be able to demonstrate a five year housing land supply and perform well in the housing delivery test are also key metrics as to the effectiveness of the spatial strategy. The continued delivery of the site allocations and their ability to contribute to the overall spatial strategy is also a further consideration.</p>
B3.	Your policies update is likely to affect more than a single strategic site or one or more strategic policies that will have consequential impacts on other policies of the plan.	YES	The increased local housing need figure, alongside the extended plan-period, will have consequential impacts on other policies in the plan.

	<p>You have answered yes to one or more questions above.</p>	<p>YES</p>	<p>You are likely to need to undertake a full update of your spatial strategy and strategic policies (and potentially non-strategic policies). Use your responses above to complete Section B4.</p>
	<p>You have said no to <u>all</u> questions (B1 to B3) above</p>		<p>If you are confident that the update can be undertaken without impacting on your spatial strategy and other elements of the Plan, you are likely to only need to undertake a partial update of policies. Complete Section B4 to indicate the specific parts / policies of the plan that are likely to require updating based on the answers you have given above.</p>
<p>B4.</p>	<p><u>Decision:</u> Full Update of Plan Policies</p> <p>Reasons for scope of review:</p> <p>It is likely that be a full, rather than partial, review of the Plan will be required. This is largely because of the need to consider potential changes to housing requirements and the implications for other aspects of the Plan, along with the need to ensure that all policies are consistent with the latest NPPF and legislation. A full update will also allow the Council to give greater emphasis to climate change mitigation and adaptation and to design quality.</p> <p>It is recommended that decisions on the final scope of the review and its associated timetable should be made when the implications of the proposed changes to the NPPF are better understood, the Levelling-up and Regeneration Bill has received Royal Assent, and the statutory framework required to implement the reforms has been approved.</p>		