



District Plan

Interim Development Strategy Report

January 2014

*Incorporating minor amendments following the
District Planning Executive Panel on 16th January 2014*

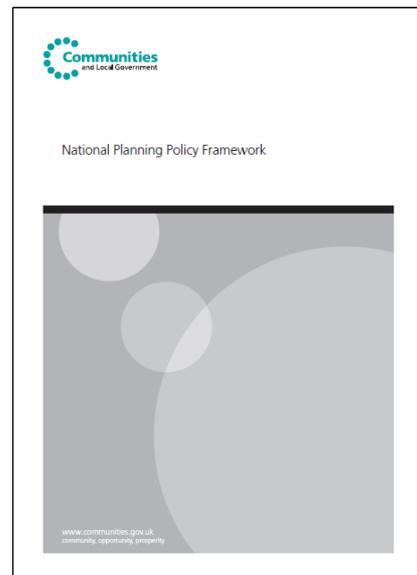
www.eastherts.gov.uk/strategyreport

Contents

1. Introduction	3
2. Approach	6
3. Evidence	13
4. Housing Requirements	21
4.1 Introduction	22
4.2 Housing Need	23
4.3 Housing Supply	25
4.4 Phasing	32
4.5 Housing Distribution	34
4.6 Strategy Worksheet	42
4.7 Summary	46
5. Green Belt	48
6. Key Diagram and Policy Approaches	59
7. Duty to Co-Operate	66
8. Conclusions and Next Steps	76
Appendix A: Key Diagram	81
Appendix B: Strategy Worksheet	82
Appendix C: Process Diagram	83
Appendix D: Phasing of Development at Broad Locations	85
Appendix E: ATLAS Note on Build Rates	89
Appendix F: Interim Sustainability Appraisal Findings	95

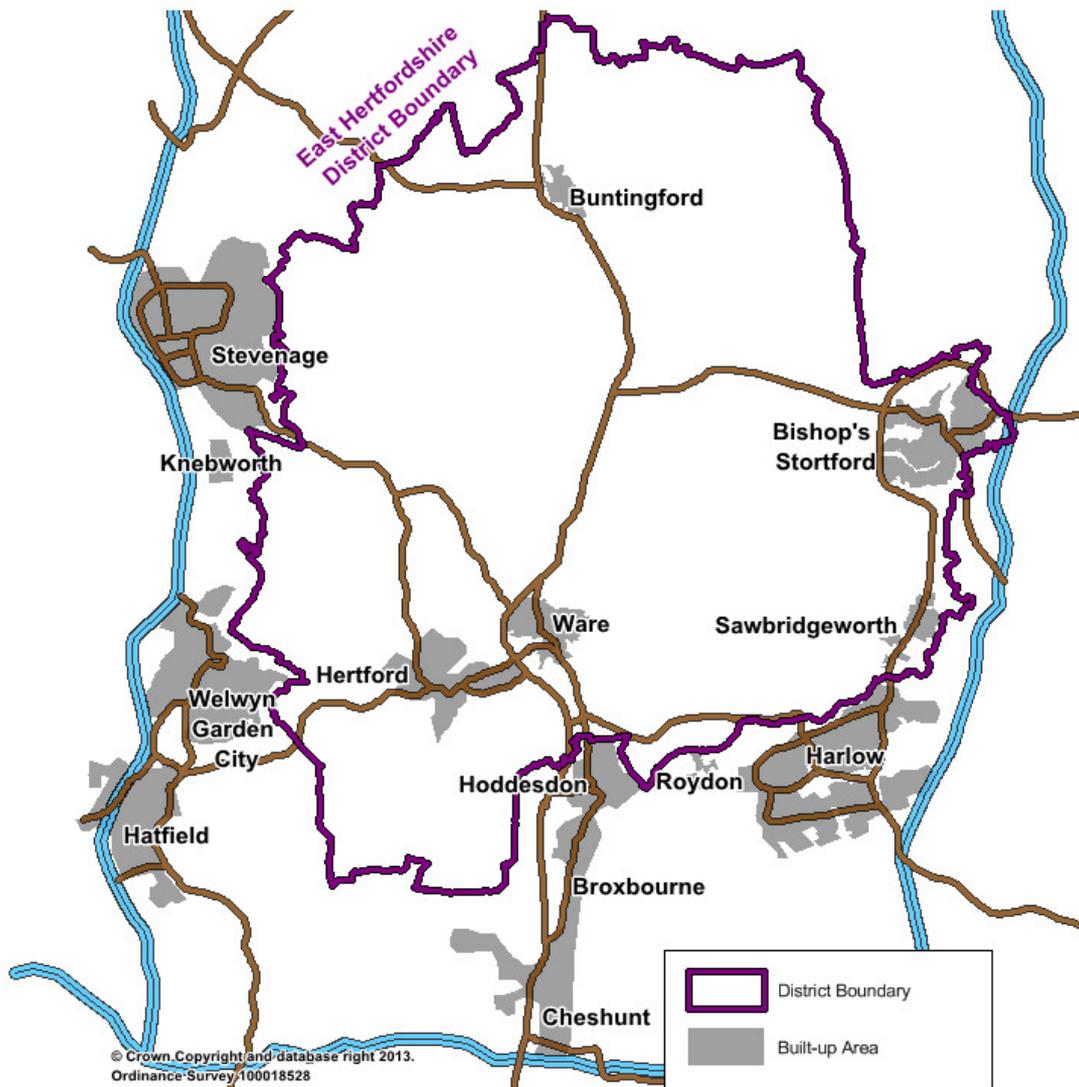
1. Introduction

- 1.1 This Interim Development Strategy Report presents important background work to the East Herts District Plan Part 1: The Development Strategy. The report is interim because it presents the position at Preferred Options stage. Further work on the emerging District Plan will be needed during 2014 before the Strategy Report can be finalised.
- 1.2 The District Plan contains explanation of approaches to several aspects of the development strategy, relating for example to economic development and green infrastructure, and this is not repeated here. The interim development strategy report seeks to provide additional explanation, in particular in relation to housing requirements, Green Belt, and the Duty to Co-Operate, since it is not appropriate or possible to provide all this detail within the District Plan itself. This document therefore provides part of the justification for the development strategy.
- 1.3 Before it can be adopted as policy by East Herts Council, the District Plan must first undergo Examination in Public (EiP) presided over by a Planning Inspector appointed by the Government. Unless the Planning Inspector recommends that the District Plan is sound, the plan will be at high risk of legal challenge.
- 1.4 In deciding whether or not a plan is sound, one of the Planning Inspector's main concerns is whether or not the plan conforms to the requirements of the National Planning Policy Framework (NPPF). The NPPF includes many top-down requirements which relate particularly to housing requirements.
- 1.5 The aim of the Development Strategy Report is to demonstrate how the District Plan conforms to national requirements and therefore that it can be assessed as sound and adopted as part of the statutory development plan.
- 1.6 Chapters 1-3 of this report set out the background and summarise the process of strategy formulation between March 2012 and December 2013. Chapters 4, 5, 6 and 7 set out the NPPF compliance aspects of the District Plan. Chapter 8 then draws this together to demonstrate how the District Plan meets the tests of soundness contained in Paragraph 182 of the NPPF.



- 1.7 The area of interest for the District Plan is shown in Figure 1.1. The District Plan operates District-wide and will provide a framework for lower tier plans such as neighbourhood plans, but it must also relate to Local Plans prepared by District and Borough Councils in adjoining local planning authority areas.

Figure 1.1: East Herts Context

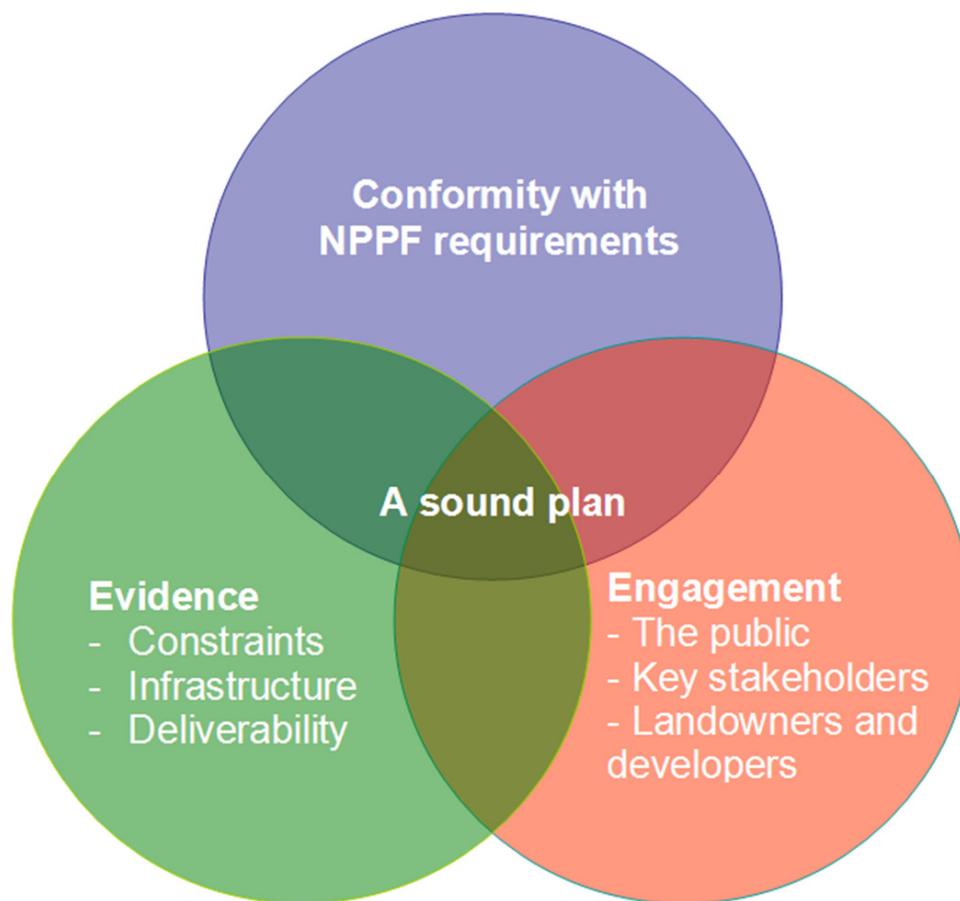


- 1.8 From this it is apparent that there are three large towns adjoining the district boundary: Harlow, Stevenage, and Welwyn Garden City. Within the District the main towns are Bishop's Stortford, Buntingford, Hertford, Sawbridgeworth, and Ware. No motorways pass through East Herts, but the M11 passes nearby to the east, the M25 to the south, and the A1(M) to the west. The main roads in the district are the A10 running north-south, and the A414 running east-west. Bishop's Stortford is the nearest East Herts town to a motorway junction.

2. Approach

- 2.1 The NPPF has four requirements of a sound plan: it should be positively prepared, justified, effective, and consistent with national policy. Chapter 8 will demonstrate how the District Plan will meet these requirements. A diagram illustrating the process is provided in Appendix C.
- 2.2 Before considering this, it is helpful to consider a simplified diagram showing the overall approach, as set out in Figure 2.1 below.

Figure 2.1: Integrated approach to plan-making



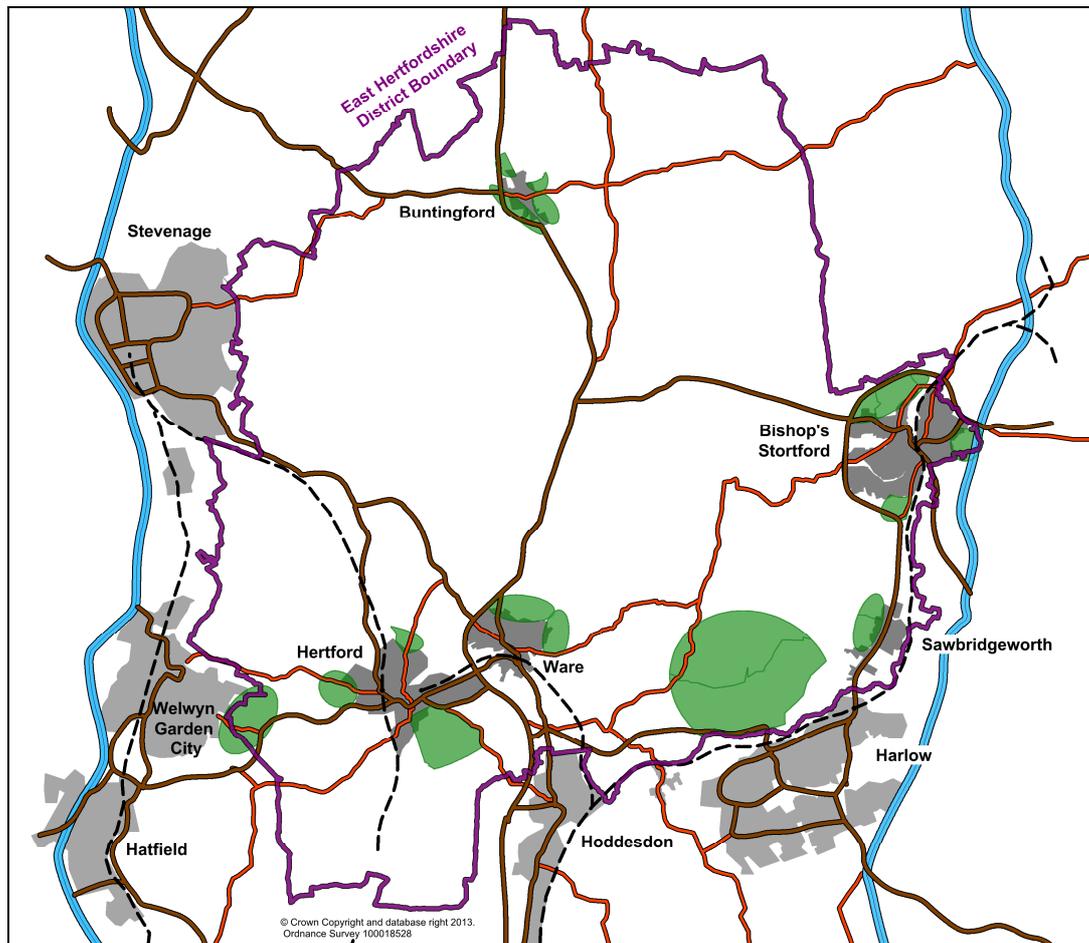
- 2.3 The role of the Council is to balance and integrate these various requirements. In some cases there will be conflicting and contradictory aspirations expressed. The difficult task of the District Council is to reconcile these different perspectives to produce a sound plan.
- 2.4 **Evidence** has been assembled through technical studies, and also gathered from landowners and developers. An Infrastructure Topic Paper (January 2014) will evolve into an Infrastructure Delivery Plan during 2014 prior to examination in public. A considerable amount of local evidence has been gathered, and this is reviewed in Chapter 3.

- 2.5 **Engagement** is a continuous process throughout plan-making which includes formal consultation and a range of formal and informal contacts with a large range of individuals and organisations. The Council received over 7,000 comments to its Issues and Options consultation in autumn 2010. Engagement with infrastructure and service providers, landowners and developers, neighbouring planning authorities, the County Council, and various statutory and non-statutory bodies is an intrinsic part of the process of strategy formulation.
- 2.6 **Conformity with NPPF requirements** is essential to soundness, but is one of the most difficult and controversial parts of the plan. The Council has carefully studied the interpretation of the NPPF by the Planning Inspectorate at a large number of Local Plan examinations and is in a strong position to be able to apply that knowledge to the production of the plan.

The Supporting Document

- 2.7 The development strategy has emerged gradually over the course of 18 months. It has been presented through a number of reports to the District Planning Executive Panel since March 2012.
- 2.8 These reports have been conceived as a single 'Supporting Document' in order to assist with continuity and clarity of interpretation. The Supporting Document is available at www.eastherts.gov.uk/supportingdocument.
- 2.9 The Supporting Document is structured as follows:
Chapter 1: Background and Approach
Chapter 2: Issues
Chapter 3: Assessment Criteria
Chapter 4: Places
Chapter 5: Options Refinement
Chapter 6: Conclusions
Appendix A: Key Documents and Feedback
Appendix B: Topic Assessments
- 2.10 The Supporting Document has been prepared in accordance with a 'stepped approach' to gradual testing and refinement of 69 'areas of search', as shown in Figure 2.2 below. Each area of search was assessed in Chapter 3 using standard assessment criteria applied to local circumstances in each case. Chapter 4: Places assessed each area of search within the wider context in terms of the whole settlement and relationship between settlements. It also examined cross-boundary strategic issues.

Figure 2.3: Shortlisted areas of search (excluding villages), Summer 2012



- 2.12 Chapter 5: Options Refinement then assessed each of the shortlisted options in terms of a) economic development opportunities and b) urban form. Chapter 6: Conclusions evaluated all the shortlisted options in terms of the evidence collected in the Supporting Document, Hertfordshire County Council's submissions on schools and transport, the Green Belt Review, infrastructure information, landowner and developer submissions. With regard to villages, these were all reconsidered taking account in particular of the size of the settlement and its capacity to accommodate further development.
- 2.13 A summary and some examples of some of the evidence from the Supporting Document are presented in Chapter 3: Evidence of this Interim Development Strategy Report.
- 2.14 The Supporting Document concluded that it could not by itself balance the strict interpretation of the NPPF with the array of evidence assembled. This difficult final task would be undertaken through the Strategy Report (i.e. this report).

Sustainability Appraisal

2.15 In addition to assessment of alternatives through the strategy selection process outlined above, East Herts Council commissioned independent consultants URS Corp to undertake a Sustainability Appraisal to assess a range of alternative options and compare these options with the preferred approach set out in the District Plan. The alternatives included:

- A new settlement in a transport corridor;
- Large-scale development options west of Sawbridgeworth and east of Stevenage;
- Concentrating development north of Harlow instead of at urban extensions to the five market towns.

2.16 The sustainability appraisal supports the approach taken by East Herts Council. A full list of options appraised is shown in Table 2.1. The main findings of the appraisal as they relate to the development strategy are included in Appendix F. For further information please refer to the Interim Sustainability Appraisal, January 2014.

Table 2.1: Alternative options appraised

Scenario	Supply source	2011-2031	After 2031
1 – Preferred Strategy	Allocations	5,580	-
	Other supply sources	5,102	-
	North of Harlow	3,000	7000
	North and East of Ware	1,800	1200
	East of Welwyn Garden City	450	1250
	TOTAL – Option 1	15,932	
2	Allocations	5,580	-
	Other supply sources	5,102	-
	East of Welwyn Garden City	1,700	-
	North and East of Ware	3,000	-
	TOTAL – Option 2	15,382	
3	Allocations	5,580	-
	Other supply sources	5,102	-
	North and East of Ware	1,700	-
	West of Sawbridgeworth	3,000	-
	TOTAL – Option 3	15,382	
4	Allocations	5,580	-
	Other supply sources	5,102	-
	East of Stevenage	5,000	-
	TOTAL – Option 4	15,682	
5	Allocations	5,580	-
	Other supply sources	5,102	-
	North of Harlow	5,000	-
	TOTAL – Option 5	15,682	
6	Allocations	5,580	-
	Other supply sources	5,102	-

Scenario	Supply source	2011-2031	After 2031
	New settlement in a transport corridor	5,000	-
	TOTAL – Option 6	15,682	
7	Allocations	0	-
	Other supply sources	5,102	-
	North of Harlow	10,000	-
	TOTAL – Option 7	15,102	
8	Allocations	5,580	-
	Other supply sources	5,102	-
	East of Welwyn Garden City	1,700	-
	North and East of Ware	3,000	-
	North of Harlow	10,000	-
	TOTAL – Option 8	25,382	

Source: East Herts District Plan interim Sustainability Appraisal, URS Corp January 2014.

2.17 Along with the strategy selection process in the Supporting Document, the Sustainability Appraisal forms an important part of the justification of the preferred development strategy set out in the District Plan. This will be explored further in relation to soundness requirements in Chapter 8: Conclusions and Next Steps.

3. Evidence

- 3.1 This chapter illustrates how evidence has been used to narrow down the strategic options and formulate the development strategy. Given the very large volume of evidence assembled and applied in reaching this point, the examples presented here are limited. For further information please refer to www.eastherts.gov.uk/supportingdocument
- 3.2 Chapter 2 of the Supporting Document (March 2012) provided a high level review of the main planning issues as shown below, prior to commencement of assessment of particular areas of search.

Housing Economy Education Transport Water Telecoms, Gas, and Electricity	Natural and Historic Environment Green Belt Community and Leisure Natural Resources Environmental Quality
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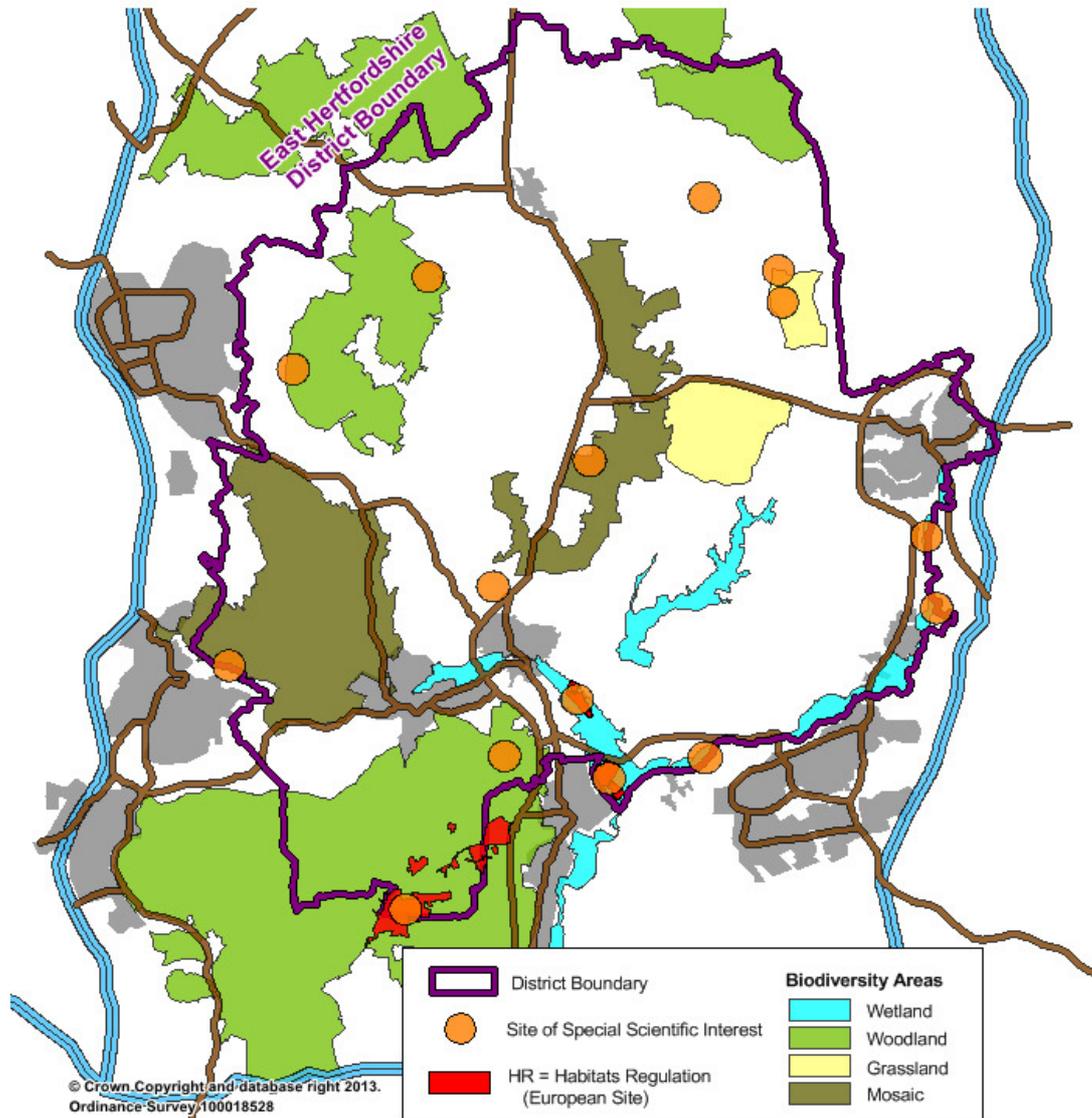
- 3.3. Chapter 3 of the Supporting Document (March 2012/Summer 2012) established a number of assessment topics as shown below.

Land availability Employment potential Primary schools Secondary/middle schools Highways infrastructure Vehicular access Access to bus services Access to rail services Waste water impact Flood risk Designated wildlife sites Historic Assets	Landscape Character Green Belt Strategic Gaps Boundary Limits Community Facilities Minerals and Waste designations Agricultural Land Classifications Environmental Stewardship Noise Impacts
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- 3.4 Assessment criteria were established within each topic. The assessments are presented in Appendix B of the Supporting Document. The assessments were then used to inform an evaluation of individual areas of search in the first part of Chapter 4: Places.
- 3.5 The following series of diagrams provide examples of factors which have informed the selection of the strategy. Whilst not exhaustive, the diagrams illustrate that the development strategy is obliged to consider a district-wide approach in order to meet national requirements.

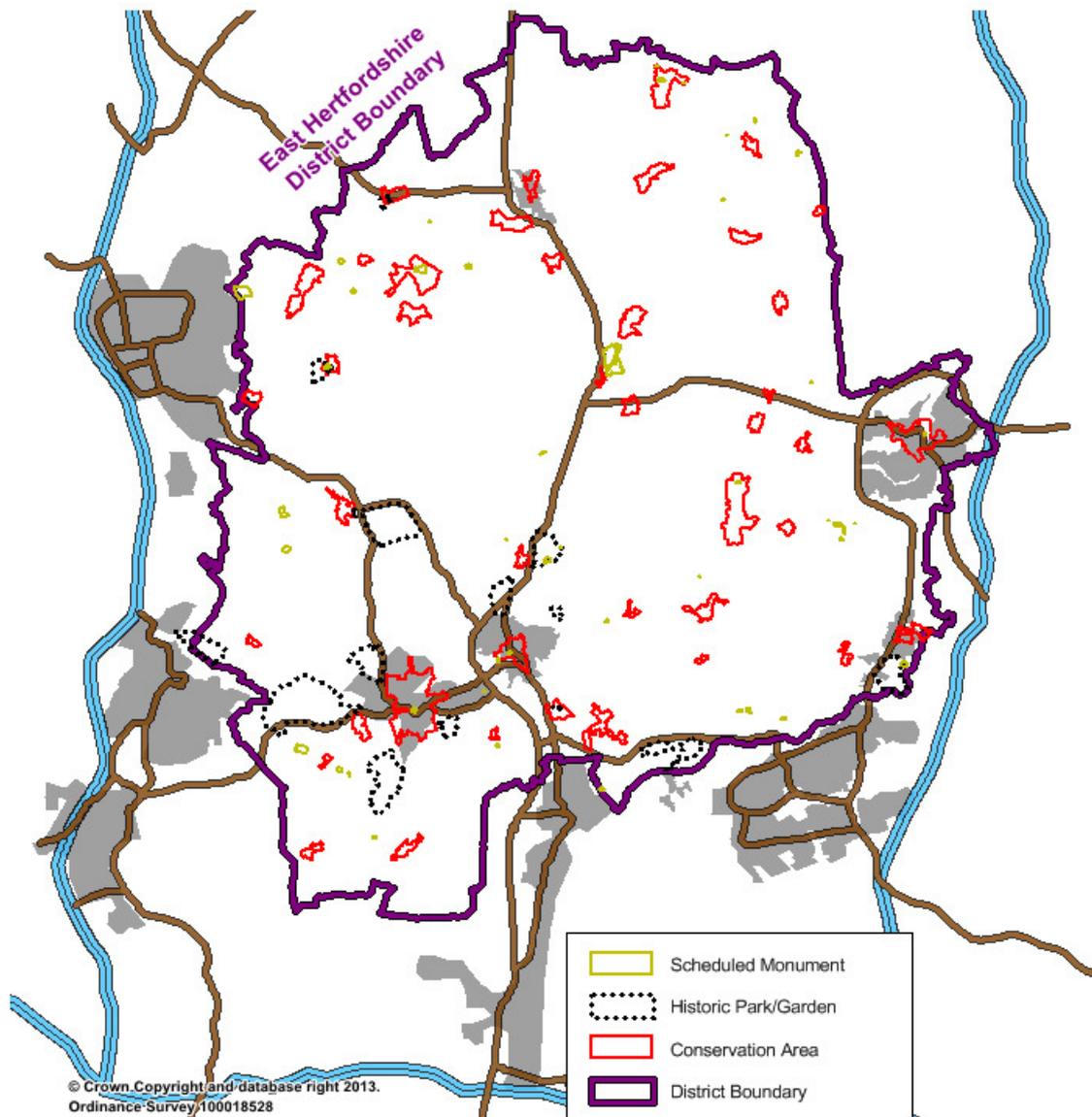
3.6 National policy requires an approach which differentiates between a hierarchy of international, national, and local wildlife sites. The development strategy will provide a Green Infrastructure framework which protects these habitats.

Figure 3.1: Designated Wildlife Habitats



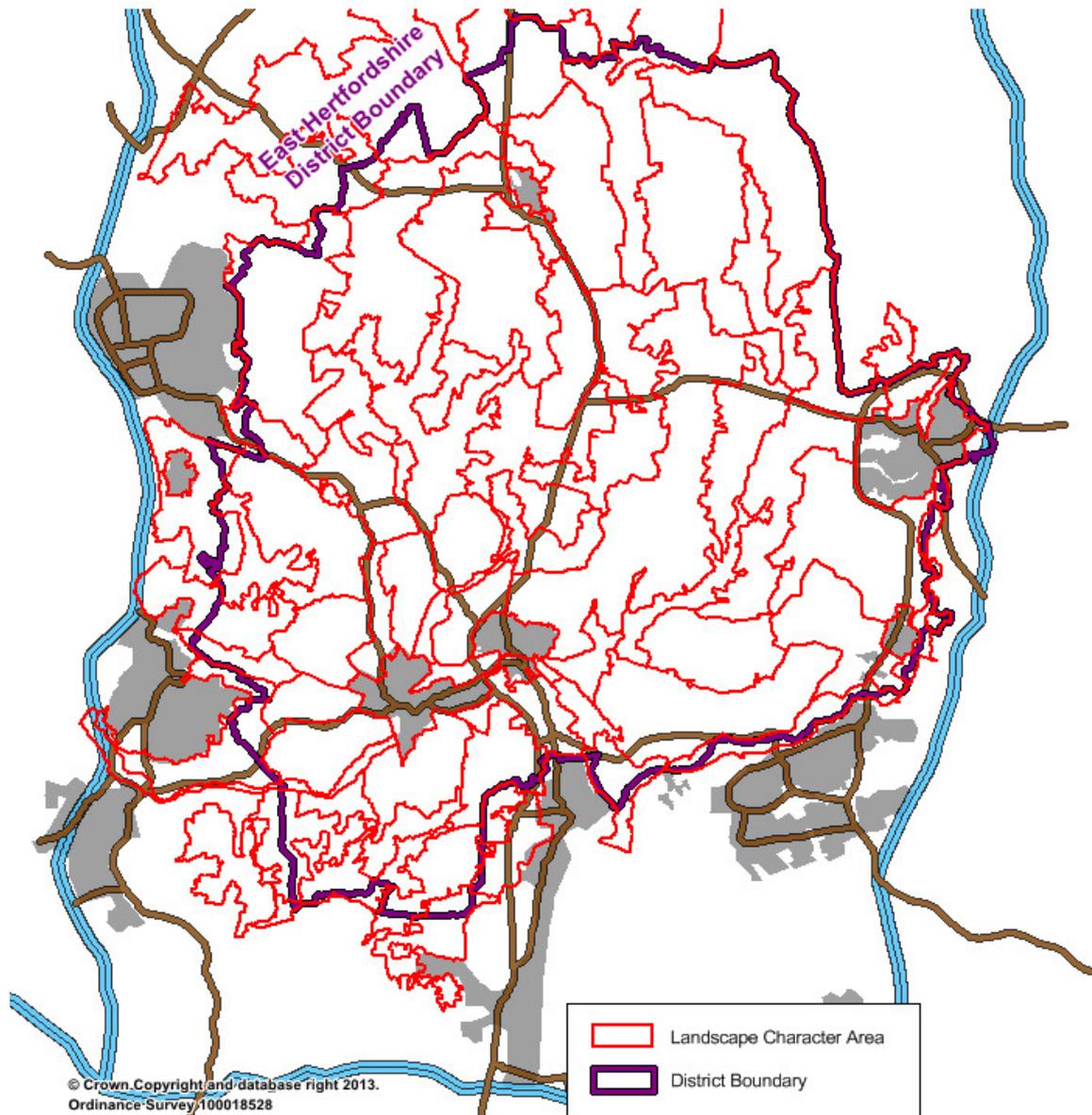
3.7 Historic assets constrain development in the District in some locations, notably around Hertford. There are a large number of historic parks and gardens which will be protected by the development strategy. District Plan policies will protect designated and non-designated historic assets.

Figure 3.2: Historic assets



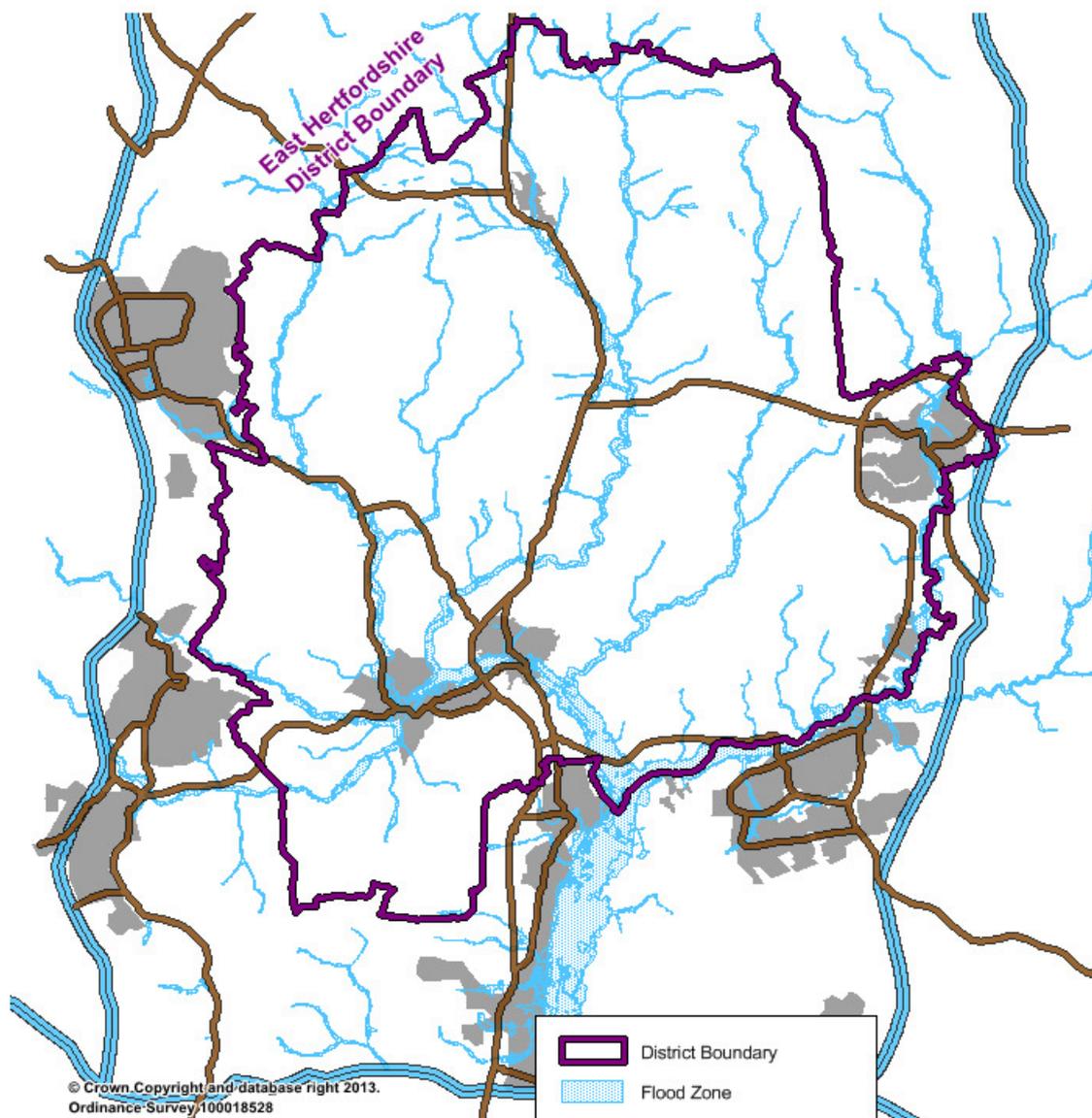
3.8 The Landscape Character Assessment (2007) assessed a large number of distinct areas across the district. This assessment has been used as evidence, for example, of the need to avoid development in the Beane Valley and the Stort Valley.

Figure 3.3: Landscape Character Areas



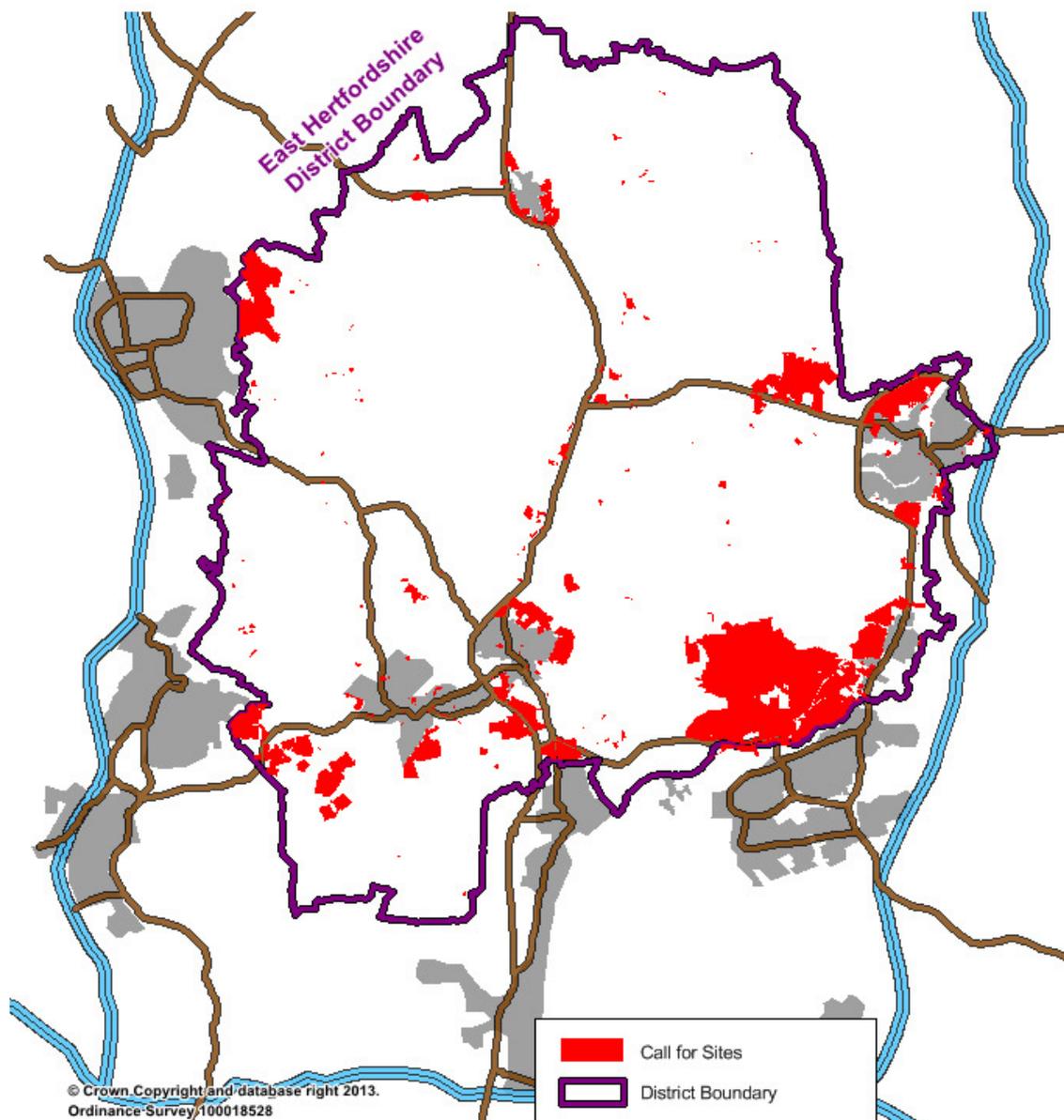
3.10 The Council's Strategic Flood Risk Assessment (SFRA) includes detailed mapping of all sources of flooding. Up to date mapping has been used and will be included in an updated SFRA to be prepared during 2014. Figure 3.4 shows Flood Zone 2, and illustrates how the river network constrains the options for urban extensions in some locations. River crossings make the provision of new bridges extremely expensive.

Figure 3.4: River flooding



3.11 Deliverability and effectiveness of the development strategy depend on landowners to provide land and developers to build. Developer information has been collected through a Call for Sites, questionnaire, and follow-up questions and information. This information has been critically appraised by the Council in formulation of the development strategy. Further explanation is available at www.eastherts.gov.uk/developerinfo

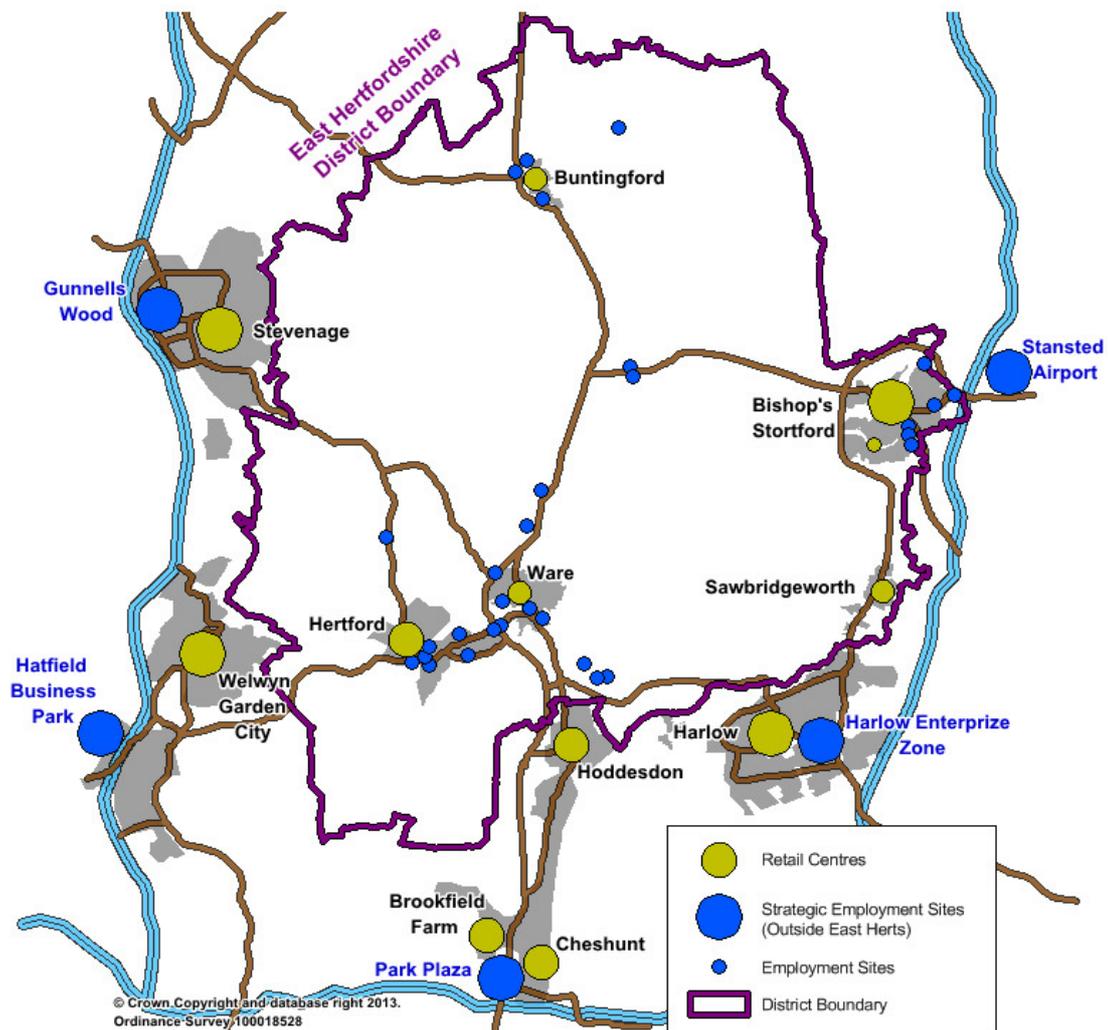
Figure 3.5: Landowner and developer proposed sites



Source: Call for Sites (2009+), www.eastherts.gov.uk/callforsites

3.12 East Herts Strategic Employment Advice (2012) shows how East Herts provides smaller employment areas and with a small number of exceptions, primarily serves Small and Medium Sized Enterprises (SMEs). The District plays an important role in providing a high quality of life and residential environment attracting a skilled workforce to the area, many of whom work at larger employment areas outside the District. Outside designated employment areas, there are a large number of jobs in the service sector. There is a trend towards increased home-working.

Figure 3.6: Employment and retail



4. Housing Requirements

4.1 Introduction

- 4.1.1 As explained in the introduction to this report, conformity with National Planning Policy Framework (NPPF) requirements is one of the main components of a sound plan. East Herts Council has conducted an extensive review of the reports and letters of Planning Inspectors in relation to Local Plans around the country¹. From this it is clear that conformity with housing requirements in the NPPF is one of the main areas scrutinised by the Planning Inspectorate. A number of local planning authorities have submitted their plans to the Inspectorate, only to be told to increase the level of proposed housing or otherwise change major aspects of the draft plan.
- 4.1.2 The development strategy for the District includes a range of components, including retail and economic development, green infrastructure, leisure and recreation. Given the emphasis of national policy on meeting housing need, and also the specific local circumstances of East Herts as a net generator of out-commuters, housing strategy is perhaps the single most important component of the development strategy, as well as one of the most complicated. Therefore this chapter has been broken down into sub-sections to enable clarification and further detail than has been possible through the explanatory text within the draft District Plan itself.
- 4.1.3 This chapter demonstrates how national policy requirements shape the overall development strategy. It begins with an assessment of housing need (section 4.2) and then shows what level of housing supply is available to meet those needs (section 4.3). National requirements for the geographical spread and distribution of development are outlined, and it is demonstrated how these requirements could align with the available supply (section 4.4) and phasing requirements are also considered (section 4.5).
- 4.1.4 Finally, the chapter explains how the supply and phasing have been aligned with housing requirements into a strategy worksheet (section 4.6). The worksheet will become the basis for the future housing trajectory which will sit behind the District Plan and will be updated regularly as part of the Annual Monitoring Report.

¹ Review of Planning Inspectorate Reports and Letters, www.easthert.gov.uk/strategyreport

4.2 Housing Need

4.2.1 In order to establish the level of housing need, East Herts Council has used a reputable specialist in demographic projections using a methodology which complies with national requirements.

National Planning Policy Framework

Paragraph 47

To boost significantly the supply of housing, local planning authorities should...use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.

Paragraph 159:

Local planning authorities should have a clear understanding of housing needs in their area. They should... prepare a Strategic Housing Market Assessment to assess their full housing needs [and] meet[s] household and population projections, taking account of migration and demographic change...

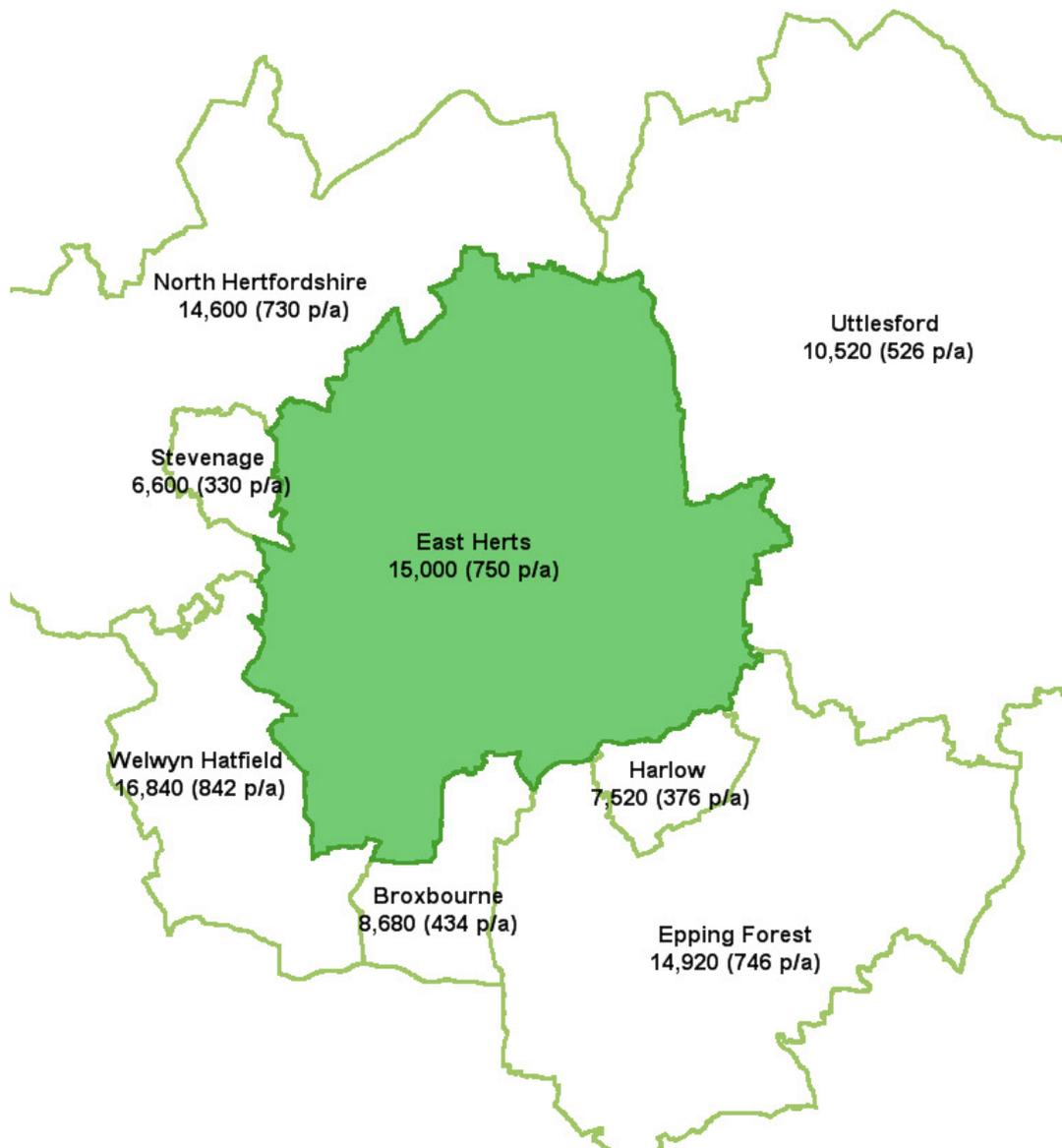
[emphasis added]

4.2.2 By combining the Edge Analytics work with recent 2013 CLG Household Projections, the District Council estimates that the objectively assessed need is 736 dwellings per annum. To avoid giving a false impression of precision, and to allow a degree of contingency, this figure has been rounded up to **750 dwellings per annum**.

4.2.3 **Over 20 years, this amounts to a housing need of 15,000 dwellings.** The provision of affordable housing is a more detailed matter which must take account of viability considerations and is beyond the scope of this Strategy Report.

4.2.4 Figure 4.1 below puts this into the context of the level of projected need in the surrounding Boroughs and Districts.

Figure 4.1: Housing need of East Herts and adjoining Districts and Boroughs



Caution – these are based on publicly available figures and have not been adopted by the Local Planning Authorities shown.

4.2.5 A report by Cambridge University explains that the official DCLG figures “provide a ready-made and widely accepted basis”² for establishing housing need, and this is reflected in the Planning Inspectorate’s comments on plans submitted for Examination in Public. Local planning authorities are not able to change the official projections, and should “make every effort” to meet them (NPPF Paragraph 17).

² Choice of Assumptions in Forecasting Housing Requirements: Methodological Notes (Cambridge Centre for Housing and Planning Research, March 2013)

4.3 Housing Supply

4.3.1 This section sets out the main supply sources and then draws these together at the end to illustrate how supply could meet the projected need. There are six supply sources as follows:

- Urban Areas (1/6)
- Completions (2/6)
- Commitments (3/6)
- Urban extensions to towns (4/6)
- Villages (5/6)
- Windfall (6/6)

Housing Supply (1/6): Urban Areas

4.3.2 Within the urban areas of the five towns (Bishop's Stortford, Buntingford, Hertford, Sawbridgeworth, and Ware) the Council has identified a number of development sites in accordance with the national requirements set out in the box below:

National Planning Policy Framework, Paragraph 159

Local planning authorities should have a clear understanding of housing needs in their area. They should...prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

4.3.3 East Herts Council has prepared a SLAA, not limited to housing but taking account of all forms of development. The SLAA is available on the Council's website at www.eastherts.gov.uk/slaa

Table 4.1: Urban capacity – Strategic Land Availability Assessment (as of 31st March 2013)

Urban Area	Dwellings
Bishop's Stortford	247
Buntingford	13
Hertford	151
Sawbridgeworth	5
Ware	18
TOTAL	434

4.3.4 In addition to these sites, the Council has identified five sites within the urban areas which will be allocated for development. These are as follows:

- **Goods Yard, Bishop's Stortford** allocated for 200 dwellings as part of a mixed use development;
- **Hadham Road Reserve Secondary School Site, Bishop's Stortford:** allocated for 250 dwellings, but will only be released for residential development if a secondary school is not required on the site;
- **Buntingford Depot:** allocated for 300 dwellings;
- **Mead Lane, Hertford:** allocated for a mixed-use development including 300 dwellings;
- **Former Co-op Depot , Star Street, Ware:** allocated a mixed-use development including 14 dwellings.

4.3.5 The allocated sites amount to a range of 814-1064 dwellings, depending on whether or not the Hadham Road site is required for a secondary school. Adding together the SLAA number plus the five additional site allocations above gives a total urban capacity of either 1,248 or 1,498 dwellings.

Housing Supply (2/6): Completions

4.3.6 Monitoring of completions is undertaken jointly by Hertfordshire County and East Herts Council on an annual basis. Based on the latest available set of monitoring data (March 2013):

Table 4.2: Completions 1st April 2011-31st March 2013

Completions	Dwellings
Bishop's Stortford	240
Buntingford	111
Hertford	302
Sawbridgeworth	102
Ware	150
Villages/rural area	177
TOTAL	1,082

Housing Supply (3/6): Commitments

4.3.7 These are sites with planning permission. Treatment of sites with planning permission is set out in national policy as shown in the box below:

National Planning Policy Framework, Footnote 11 to paragraph 47

...Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

4.3.8 Table 4.3 below shows housing commitments across the District as of 31 March 2013:

Table 4.3: Commitments

Location	Large sites (5+ dwellings)	Small sites	Total
Bishop's Stortford	147	51	197
Buntingford	119	28	147
Hertford	393	52	445
Sawbridgeworth	39	16	55
Ware	123	25	148
Category 1 Villages	173	17	190
Category 2 villages/rural area	301	89	390
TOTAL	1,294	278	1,572

Housing Supply (4/6): Urban Extensions to towns

4.3.10 A number of locations for possible urban extensions were identified through the Supporting Document process, based on assessment of the areas of search. These are included in Table 4.4 below:

Table 4.4: Potential Urban Extensions

Location	Number of dwellings
Bishop's Stortford North	2,350- 2,600
Bishop's Stortford South	750-1,000
Bishop's Stortford East	150
Buntingford North	180
Buntingford South (depot)	300
Hertford West	550
Hertford North	150
Hertford South	50
Sawbridgeworth West	400
Ware North and East	200-3,000
East of Welwyn Garden City	1,700
Gilston Area (north of Harlow)	5,000-10,000

4.3.11 A range of numbers is provided at the following locations:

- Bishop's Stortford North and South, to allow flexibility in choice of a suitable location for additional secondary school capacity;
- Ware North and East, to enable further testing of a range between 200 and 3,000 dwellings to assess the feasibility of transport solutions and other considerations;
- Gilston Area (north of Harlow), providing a range for further testing between 5,000 and 10,000 dwellings to assess the feasibility of transport solutions and other considerations.

Housing Supply (5/6): Villages

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

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

4.3.14 Chapter 6 of the Supporting Document³ sought to further refine the work previously undertaken on the villages in order to inform the final strategy. The following villages were identified as Group 1 Villages:

- Braughing
- High Cross
- Hunsdon
- Little Hadham and Hadham Ford
- Much Hadham
- Standon and Puckeridge
- Walkern
- Watton-at-Stone
- Widford

4.3.15 On the basis that at least a 10% increase in housing is achievable and sustainable in these settlements, it is considered reasonable that these

³ www.eastherts.gov.uk/supportingdocument

villages between them should accommodate at least 500 new homes over the Plan period.

4.3.16 The following are identified as Group 2 Villages:

- Aston
- Bayford
- Benington
- Birch Green
- Colliers End
- Cole Green
- Cottered
- Dane End
- Datchworth
- Furneux Pelham
- Hertford Heath
- Hertingfordbury
- High Wych
- Letty Green
- Spellbrook
- Stanstead Abbots and St Margarets
- Stapleford
- Tewin
- Thundridge
- Tonwell
- Wadesmill
- Westmill

4.3.17 No specific housing requirement has been identified for these villages. Where housing development does take place this will contribute towards the district-wide housing windfall allowance (see Windfall 6/6 below).

4.3.18 The SLAA has identified sites for 131 dwellings within the boundaries of the Category 1 villages. These locations may present suitable areas for development. However, the policy approach taken by the District Plan is to encourage Parish Councils to identify suitable sites in the Group 1 villages. The SLAA will be revised during 2014 to assess the options in terms of Group 1 villages as part of the new development plan.

Housing Supply (6/6): Windfall

4.3.19 These are sites which have not been specifically identified in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.

National Planning Policy Framework, Paragraph 48

Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens

4.3.20 East Herts Council has carried out detailed analysis into historic rates of windfall development in the District and this evidence is included within the SLAA Technical Study which is available to view here: www.eastherts.gov.uk/slaa.

4.3.21 The assessment concluded that it would be reasonable to assume an annual windfall allowance of 100 dwellings for the District Plan. However, in order not to over-estimate the potential supply from windfalls, it was considered appropriate to apply a percentage reduction to the annual windfall allowance of 100 dwellings, in recognition of the fact that windfall sites are by their nature a finite source of housing supply. Furthermore, it was also considered reasonable that because the District Plan runs for twenty years from 2011-2031, the percentage reduction should also be increased over time.

4.3.22 The windfall allowance for the District Plan period is summarised in Table 4.5 below.

Table 4.5: Windfall Allowance 2011-2031

Years	Reduction	Annual Allowance	5 year Total
1-5	0%	100	500
6-10	10%	90	450
11-15	20%	80	400
16-20	30%	70	350
Total			1,700

4.3.23 The windfall allowance for years 1-5 shown above covers the period from 2011-2016. Therefore, this figure has been deducted from the housing supply calculation to avoid double counting as many of these sites will already have gained planning permission and will have been included within the commitments figure.

4.3.24 This leaves a windfall allowance of 1,200 dwellings to cover the period from 2016-2031.

Summary – Housing Supply

4.3.25 It is not possible to split out windfall allowance or the village allowance further. Table 4.6 sets out the housing supply options taking account of the sources listed above.

Table 4.6: Potential housing supply by location

Location		Dwellings	Total
Bishop's Stortford	Completions	240	4,634 (250 deducted to provide school site)
	Commitments	197	
	Urban Area (SLAA)	247	
	Goods Yard	200	
	Hadham Road Reserve	0-250	
	Secondary School Site		
	North		
	East	150	
South	750-1,000		
Buntingford	Completions	111	751
	Commitments	147	
	Urban Area (SLAA)	13	
	South (former Depot)	300	
	North	180	
Hertford	Completions	302	1,948
	Commitments	445	
	Urban Area (SLAA)	151	
	Mead Lane	300	
	North	150	
	South	50	
	West	550	
Sawbridgeworth	Completions	102	562
	Commitments	55	
	Urban Area (SLAA)	5	
	West	400	
Ware	Completions	150	530 - 3,330
	Commitments	148	
	Urban Area (SLAA)	18	
	Former Co-op Depot, Star Street	14	
	North and East	200-3,000	
Gilston Area (north of Harlow)	-	5,000-10,000	5,000 - 10,000
East of Welwyn Garden City	-	1,700	1,700
Villages/rural area	Completions	177	1,257
	Commitments	580	
	Group 1 village allowance	500	

4.4 Phasing

4.4.1 The NPPF requires that phasing should be taken into account, as set out in the box below:

National Planning Policy Framework, Paragraph 47

To boost significantly the supply of housing, local planning authorities should....

- identify and update annually a supply of specific deliverable* sites sufficient to provide five years worth of housing against their housing requirements...
- identify a supply of specific, developable** sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.

* To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable....

** To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

4.4.2 Two aspects of phasing are the build rate and the start date. The economic cycle is an important variable which may affect both factors, and is notoriously difficult to predict. East Herts Council has therefore taken an approach to phasing based on evidence from elsewhere in the country. Phasing will be considered as part of the Annual Monitoring Framework, and significant variations from the planned phasing will require interventions to ensure as far as possible a continuous supply of residential development.

Build rates

4.4.3 East Herts Council has sought advice from the Advisory Team for Large Applications (ATLAS) in relation to realistic phasing and build rates at the large and complex development options including the Gilston Area (north of Harlow), north and east of Ware, east of Welwyn Garden City, and south of Bishop's Stortford. ATLAS supplied the Council with the example build rates from development schemes elsewhere in the country included at Appendix E. This shows that the highest levels of build rate have been around 450 dwellings per annum, although in practice there are many schemes which have been much slower.

Start date

4.4.4 Prior to the adoption of the plan it is anticipated that only existing commitments will be constructed, as the allocations and other provisions within the plan will not yet have come on stream. Taking recent completions and commitments together yields a total of 2,654 dwellings in the period 2011-2016. Following adoption of the plan in early 2016, the plan will be divided into three phases reflecting NPPF requirements.

4.4.5 In phase 1 (2016-2021) the following locations are considered deliverable:

- **North of Bishop's Stortford (part):** the latest information suggests that this area is capable of delivering significant levels of housing within the first five years of the plan.
- **South of Bishop's Stortford (part):** the main road network is in place around 500 dwellings could occur here before the final mix of development is agreed;
- **Other locations:** the options for development at Bishop's Stortford, Sawbridgeworth West, Hertford South and West, Buntingford South (depot), Hertford Mead Lane, Ware Former Co-op site. At these locations there are relatively few obstacles and it is anticipated that development could be completed in the period 2016-2021; and
- **Villages:** around 250 dwellings, including a proportion delivered in Group 1 villages through neighbourhood planning.

4.4.6 In phase 2 (2021-2026) the following sites are considered developable:

- **North of Bishop's Stortford (part):** around 800 dwellings;
- **South of Bishop's Stortford (part):** around 500 dwellings, depending on whether a secondary school is required at the site;
- **North of Hertford:** mineral deposits in the locality should be satisfactorily extracted prior to development (2021-2026);
- **North of Harlow (part):** around 1,250 dwellings, depending on resolution of outstanding transport issues;
- **North and East of Ware (part):** around 800 dwellings, depending on resolution of outstanding transport and education issues;
- **Villages:** around 125 dwellings, including a proportion delivered in Group 1 villages through neighbourhood planning.

4.4.7 **North of Buntingford:** in order to appropriately manage the timing and delivery of development as a whole in Buntingford, and prioritise first the use of a brownfield depot site to the south of the town, the greenfield site to the north will be retained in reserve until after 2021.

4.4.8 In phase 3 (2026-2031) the following are considered developable:

- **East of Welwyn Garden City:** around 450 dwellings after 2029, with the remainder after 2031. Requires significant prior mineral extraction and resolution of outstanding transport and consideration of the mix of development, including a possible secondary school, neighbourhood centre and employment area. Given the likely need for co-operative working with Welwyn Hatfield Borough, additional time prior to commencement is highly desirable;
- **Gilston Area (part):** around 1,750 dwellings:
- **North and east of Ware (part):** around 1,000 dwellings.

Development after the plan period (2031+)

4.4.8 From the available options, it is clear that longer term planning will require emphasis on large strategic sites, shifting the emphasis away from the five market towns within the district.

4.4.9 The National Planning Policy Framework requires that Green Belt boundaries should be capable of enduring beyond the plan period. The policy approach proposed by East Herts Council means that housing and development needs can be met at the strategic scale long-term development locations identified north and east of Ware, east of Welwyn Garden City, and in the Gilston Area (north of Harlow). Development on all three sites is anticipated to continue beyond 2031 and hence contribute to future housing needs.

4.4.10 Whilst the proposed approach will require a further Green Belt Review after the end of the District Plan period, it is clear from the evidence assembled in this Strategy Report that earlier Green Belt release would result in a loss of local control and would encourage premature planning applications.

4.4.11 Draft District Plan Policy DPS6: Long-term Planning shows how East Herts Council will continue to work positively in the future to identify alternative long-term and large-scale development locations, if it is shown that the delivery challenges on any of the identified long-term development areas cannot be overcome.

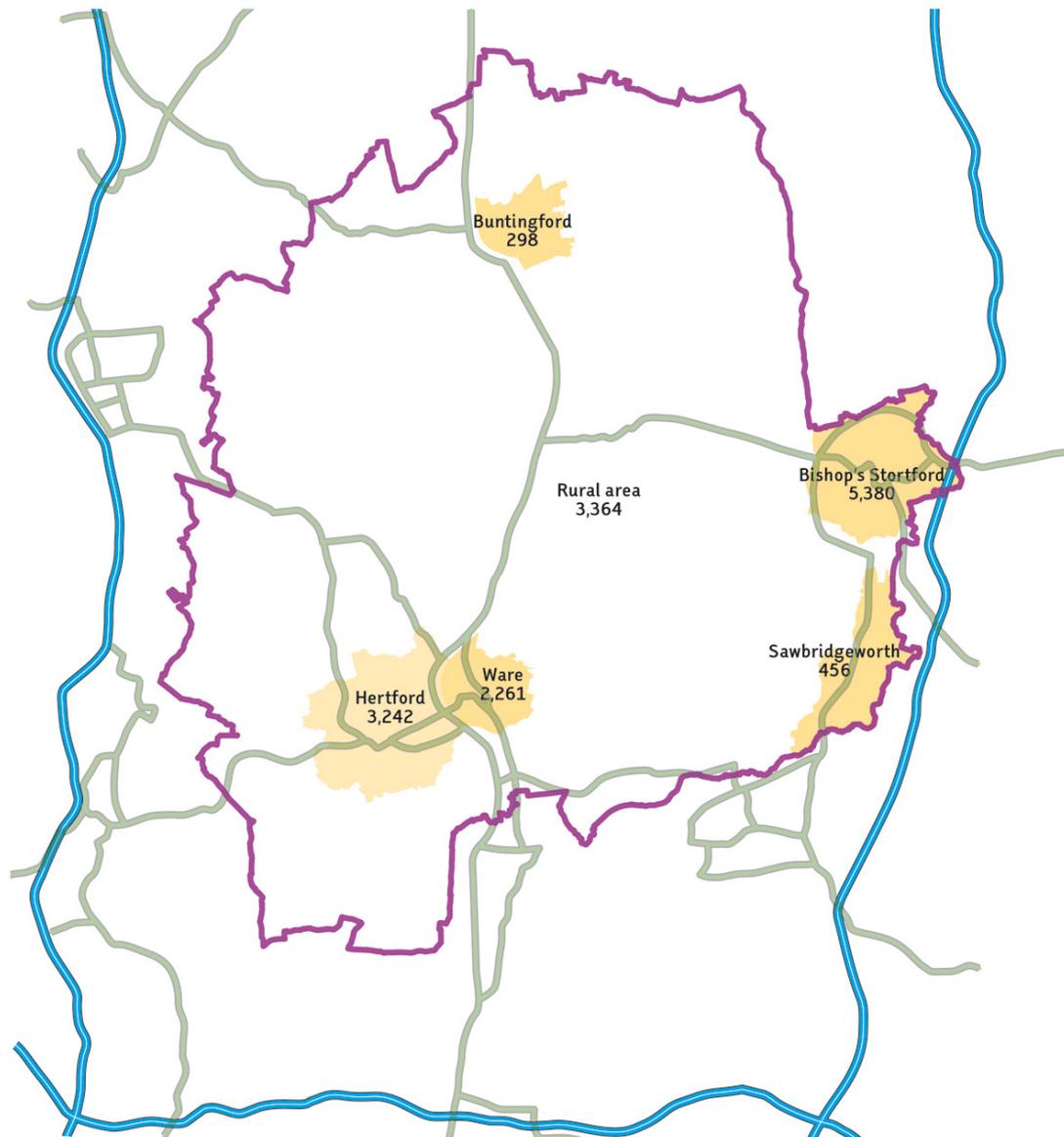
4.5 Housing Distribution

4.5.1 The distribution of development across the district is another important consideration. There are two basic conceptual options: **concentration** (meeting all or most of the 15,000 dwelling need in one place) and **dispersal** (spreading the 15,000 need across the district). However, consideration of distribution in relation to housing need suggests that needs should be met locally, where they are generated. This section investigates this issue further.

Sub-District Population Projections

4.5.2 In order to obtain a better understanding of housing needs within the District, East Herts Council commissioned Edge Analytics to produce sub-district population projections. The conclusions are shown in Figure 4.2 below, which combines the earlier Edge work with recent 2013 CLG household projections to produce a 15,000 district-wide dwelling figure:

Figure 4.2: Projected housing need – towns and rural area



Note: areas are based on Ward boundaries to enable correlation with Census figures.

4.5.3 Table 4.7 enables comparison between the projected need and potential supply in each town and in the rural area. The supply figures correspond with those in Table 4.6 above.

Table 4.7: Need and potential supply by location

Location	Projected Need	Potential supply
Bishop's Stortford	5,380	4,634
Buntingford	298	751
Hertford	3,242	1,948
Sawbridgeworth	456	562
Ware	2,261	530-3,330
Rural Area	3,364	1,257

4.5.4 The comparison of projected need suggests that there is likely to be a large unmet need in a) the rural area and the villages, b) Hertford, and c) Bishop's Stortford. It is also clear that the lower end of the potential supply at Ware would be insufficient to meet the town's needs.

4.5.5 At Buntingford, the potential supply could meet the needs of the town and the hinterland of villages in the central northern parishes, plus a few additions from the A10 corridor. Potential supply at Sawbridgeworth could meet the needs of that town but not those of the surrounding villages.

Housing Market Areas

4.5.6 National policy includes strict requirements to meet housing needs within each housing market area. According to the Beta Test version of the National Planning Practice Guidance (August 2013), *“a housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. The extent of the housing market areas identified will vary, and many will in practice cut across various local planning authority administrative boundaries. Local planning authorities should work with all the other constituent authorities under the duty to cooperate.”*

National Planning Policy Framework, Paragraph 47

To boost significantly the supply of housing, local planning authorities should...use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework(emphasis added)

4.5.7 The Strategic Housing Market Assessment developed housing market areas based on levels of self-containment⁴. They are more complex and somewhat fluid, but nevertheless important.

National Planning Policy Framework, Paragraph 159

Local planning authorities should have a clear understanding of housing needs in their area. They should...prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which...meets household and population projections, taking account of migration and demographic change;

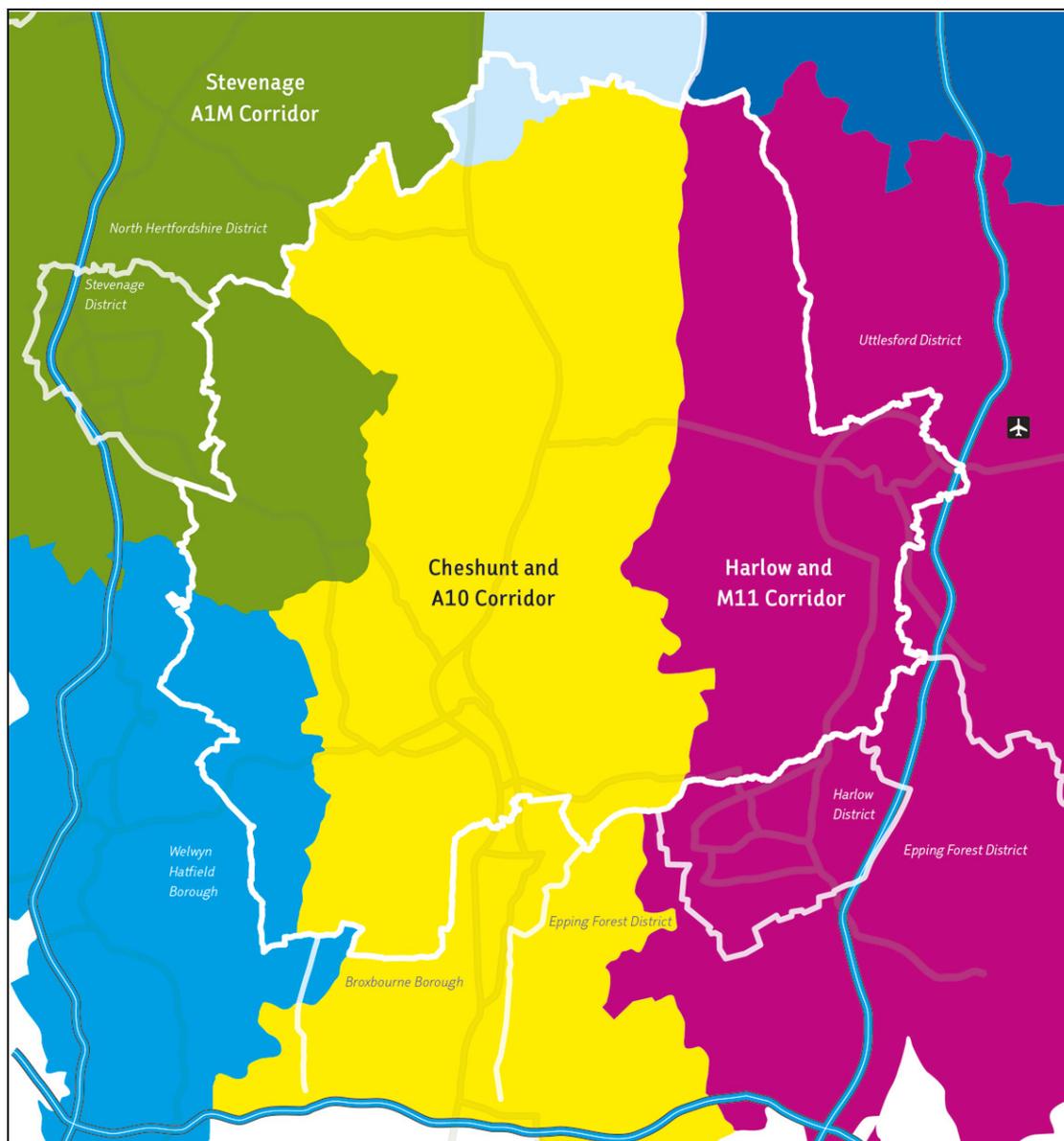
4.5.8 Four identified housing market areas cross East Herts, following the main transport corridors, and crossing boundaries:

- Cheshunt and the A10 Corridor
- Harlow and the M11 Corridor
- Stevenage A1(M) Corridor
- Welwyn Hatfield A1(M) Corridor

⁴ See Strategic Housing Market Area Assessment (2008), Chapter 3: Identifying Local Housing Sub-Markets within the Sub-region. Available online at <http://www.eastherts.gov.uk/index.jsp?articleid=15675>

4.5.9 A plan which sought to concentrate need, for example, to the north of Harlow, at the expense of needs in other areas, would not meet national requirements. A map of housing market areas is shown in Figure 4.3.

Figure 4.3: Housing Market Areas



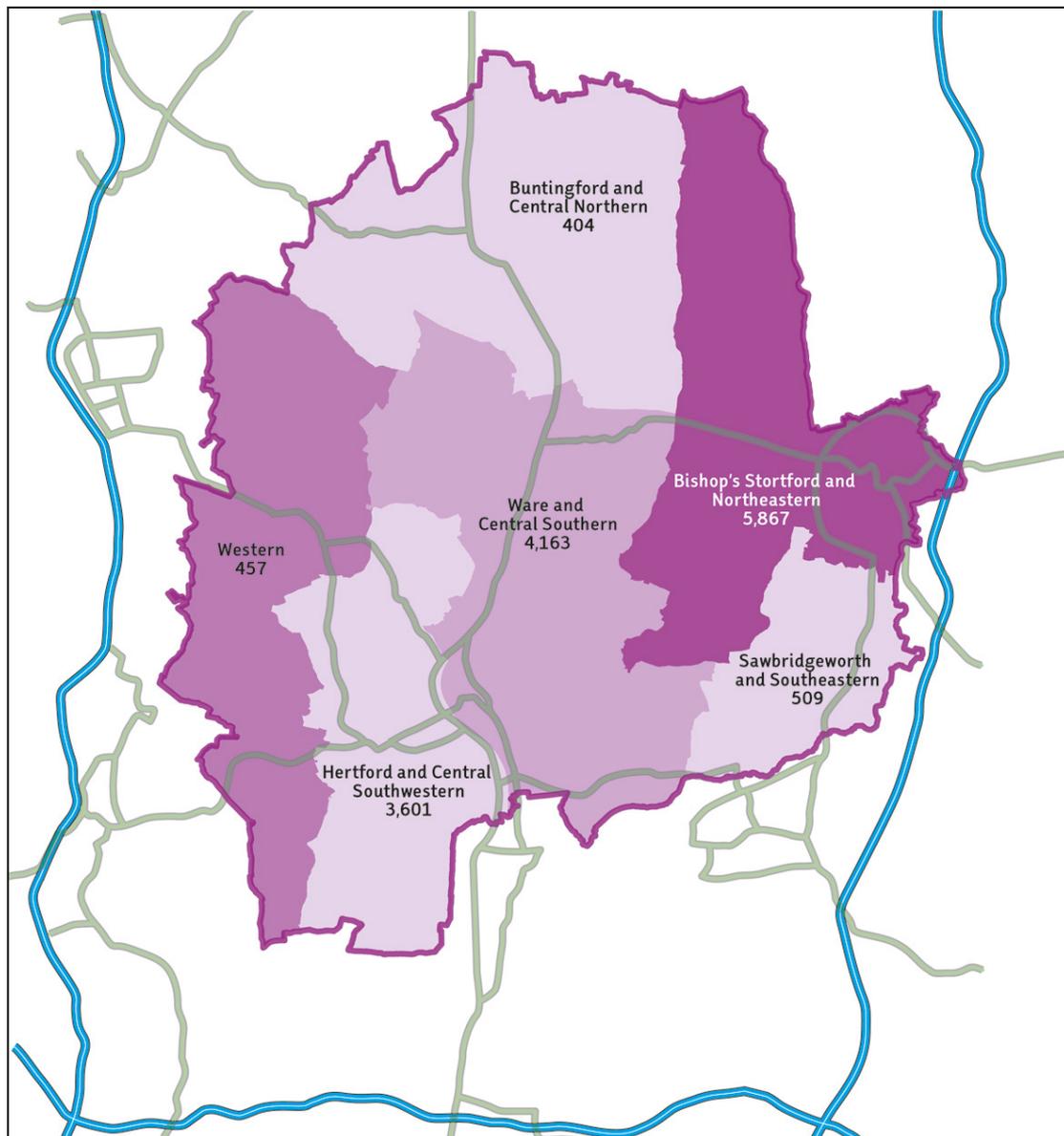
Source: *Strategic Housing Market Assessment (SHMA)*

4.5.10 In order to understand the level of need within each housing market area, East Herts Council commissioned Edge Analytics to prepare sub-district population projections⁵. Using the parish grouping figures in the study it is possible to map the needs of each parish grouping onto the housing market areas.

⁵ See www.eastherts.gov.uk/strategyreport

4.5.11 Figure 4.4 below combines the earlier Edge parish grouping work to the overall requirement of 15,000 dwellings to give a consistent figure for each grouping.

Figure 4.4: Projected housing need - Parish groupings



4.5.12 Projected need within housing market areas which cross administrative boundaries (Stevenage, Harlow, Welwyn Garden City) is addressed within Section 7: Duty to Co-Operate.

4.5.13 In order to further understand and meet housing needs locally, the second strand of the Edge Sub-District Population projections identifies needs in relation to each town and the rural area. These have been applied to the 15,000 district-wide figure for consistency, as shown in Figure 4.8:

Table 4.8: Need and potential supply by housing market area (East Herts contribution only)

Housing Market Area	Parish Grouping and projected need	Total Projected Need	Potential supply	
A10 Corridor	Ware and central southern (4,163) Buntingford and central northern (404) Hertford and central southwestern (3,601)	8,168	Hertford	1,984
			Ware	530-3,330
			Buntingford	751
Harlow and M11 Corridor	Bishop's Stortford and northeastern (5,867) Sawbridgeworth and southeastern (509)	6,376	Bishop's Stortford	4,634
			Sawbridgeworth	562
			Gilston Area (north of Harlow)	5,000-10,000
			Villages	Share of 500
Stevenage and A1(M) Corridor	Western (457)	457	Villages	Share of 500
Welwyn Hatfield and A1(M) Corridor			East of Welwyn Garden City	1,700
			Villages	Share of 500
	Total	15,001	Total	15,661 – 23,461

4.5.14 This comparison enables a guideline and should not be used rigidly but takes account of local opportunities and constraints. Projected need should not be seen as a cap on development but as one important consideration in putting together a strategy which complies with best practice and national policy requirements.

Conclusions – Housing Distribution

4.5.15 Taking account of the findings in relation to the housing market areas and the distribution between the towns and the rural area, the following approach is proposed to inform the development strategy:

- **Bishop’s Stortford** should meet the majority of its own needs, but any unmet need from Bishop’s Stortford should be met in the Gilston Area (to the north of Harlow), within the same housing market area;
- **Buntingford** should meet its own needs, plus a proportion of the unmet need from the surrounding villages which constitute its hinterland;
- **Hertford** is heavily constrained and this means that it is not able to meet its own needs locally. Therefore it is proposed that a proportion of Hertford’s unmet needs should be addressed through development east of Welwyn Garden City. Although not within the same housing market area, the SHMA recognises that the HMA boundaries are somewhat fluid, and given the importance of the A414 and the proximity of Hertford and Welwyn Garden City this approach is considered reasonable;
- **Sawbridgeworth** should meet its own needs;
- **Ware** should meet its own needs, possibly including a proportion of the need from villages which form its hinterland;
- **The Rural Area** cannot meet its own needs, and therefore these should be met elsewhere in the district, where possible within the same housing market area, or if not possible then these needs may be met in the Gilston Area to the north of Harlow.

4.6 Strategy Worksheet

4.6.1 Taking account of housing need, supply opportunities, and phasing, the numbers have been entered into a worksheet which shows the development strategy. This worksheet shows how the plan will meet NPPF requirements to deliver the plan and is contained at Appendix B.

4.6.2 **Row 1** shows the plan divided into 5 years periods in accordance with paragraph 47 of the NPPF. Calculation of housing supply and requirements starts in 2011, as this is the end date for the 2007 Local Plan, in terms of housing provision. Therefore the 750 annualised housing need has to be back-dated to 2011, even though this period is pre-plan.

4.6.3 **Row 25** shows the total supply of housing in each five year period, divided up into specific sites and locations.

4.6.4 **Row 30** shows the total housing requirement, made up of projected need (row 26) plus the shortfall (row 27), and buffer (row 29) as explained below.

4.6.5 For ease of comprehension the cells in row 30 are shown in green where the supply meets the total requirement, in all cases from 2016 to 2031.

4.6.6 **Column A** includes the type of supply as follows:

- 'Allocation' indicates sites proposed for a red-line identification on the Policies Map, removed from the Green Belt where necessary, and providing the parameters for planning applications in accordance with the policies
- 'Broad Location' indicates sites where the principle of development is acknowledged but where there are substantial issues which will require further investigation. Further information on these is provided in Section 6: Key Diagram and Policy Approaches.
- 'SLAA' refers to the smaller sites within the urban areas identified within the Strategic Land Availability Assessment (see section 4.3 above.)
- 'Other' includes completions, commitments, and windfall, as explained earlier in this chapter.

4.6.7 **Column B** indicates the location and supply source.

4.6.8 **Columns C to F** show the proposed phasing of development in 5 year blocks, to accord with Paragraph 47 of the NPPF. For further information see section 4.4 above.

4.6.9 **Column G** shows the total housing supply across the 20-year plan period from 2011 to 2031. It adds up to 15,932 dwellings in total (cell G24), or 1,096 dwellings (6%) above the level of projected housing

need, as explained in rows 32 to 34. This is addressed further in relation to contingency planning below.

4.6.10 **Column H** shows potential supply after 2031, at each of the three Broad Locations for development. This amounts to 9,450 dwellings, and assuming a continuation of housing need at 750 dwellings per annum would provide a further 12.6 years' supply of housing. This forms part of the Council's approach to long-term planning, included in draft **District Plan Policy DPS6: Long-Term Planning**.

Shortfall

4.6.11 From the worksheet it is apparent in column C that there is an anticipated supply of only 2,654 dwellings in the period 2011-2016, compared to a projected need of 3,750 dwellings over the same period, leaving a shortfall of 1,096 dwellings. The treatment of this is explained at paragraph 3.3.6 of the draft District Plan as follows:

"In the period 2011-2016 (the 'pre-plan' period) it is anticipated that only 2,654 homes will be built, leaving a shortfall of 1,096 homes when measured against the projected need of 3,750 over 5 years. Given the long lead-in times in terms of infrastructure provision, it is not realistic to expect the larger site allocations and the Broad Locations to contribute to reducing the total shortfall in the first five years. Similarly, the smaller sites cannot deliver sufficient volume to address the shortfall without the larger sites which can only be delivered later in the plan period. Therefore Policy DPS2 (The Development Strategy 2011-2031) requires the shortfall to be made up over the 15 years of the Plan. Over this time-frame, one years' worth of the shortfall amounts to 72.4 dwellings, or 362 additional homes in each five-year period. Spreading the shortfall over the Plan will enable a proportion of the shortfall to be met by the larger site allocations and the Broad Locations."

4.6.12 This means that the total requirement in the first five years of the plan amounts to 4,321 dwellings, as shown in cell D32. This figure is included in draft District Plan **Policy DPS2: The Development Strategy 2011-2031**.

Minimum Housing Levels

4.6.13 The Strategy Worksheet is necessary to demonstrate compliance with the NPPF. However, in itself it is not sufficient to demonstrate a positive approach to development, as required by Paragraph 182 of the NPPF (see Section 8 below).

4.6.14 From the review of reports and letters by the Planning Inspectorate, it is clear that an important aspect of the positive approach is in relation to housing requirements. The Planning Inspectorate does not permit Local Planning Authorities to arbitrarily cap development at the level of

projected housing need. This is because higher levels of development may be needed in order to optimise the potential of a development site. For example, slightly higher levels of development may enable the provision of additional infrastructure or other benefits. Reduction of development below a certain level may make development financially unviable, for example in terms of cash-flow implications. Therefore the Planning Inspectorate views the housing requirements in the plan as minimum figures to meet projected need.

4.6.15 This has implications for the development strategy, particularly in relation to the Broad Locations for Development, where higher levels of development are proposed than are necessary to meet the 15,000 minimum figure. In these locations reduction below the levels shown is likely to have negative implications for financial viability and supporting infrastructure.

Contingency Planning

4.6.13 Footnote 3 within **Policy DPS3: Housing Supply 2011-2031** states that *“the total figure within the plan period is higher than the minimum required figure is proposed to allow for potential slippage of programme/delay, potential reduced site capacities in light of infrastructure capacities and allowances for contingency”*. This approach is often required by Local Plan Inspectors, as demonstrated by a recent review of Local Plan examinations elsewhere in the country⁶.

4.6.14 The Annual Monitoring Report (AMR) will track the delivery of housing throughout the District, and will provide a policy tool to enable interventions, should the pace of development fall significantly behind the requirements of the District Plan. Although some slippage is to be expected during the inevitable downturns in the economy affecting the construction sector, it is expected that across the economic cycle the housing levels contained in the plan will be achieved.

4.6.15 Another component of contingency planning is the commitment in draft District Plan **Policy DPS6: Long-Term Planning**, to *“progress technical work to identify strategic-scale locations to meet long-term development needs”*. The draft Plan states at Paragraph 3.3.24 that *“If work on the Broad Locations DPD identifies difficulties in delivery in any of the Broad Locations, then it will be necessary to bring forward alternative strategic scale options as a contingency measure”*. Paragraph 3.3.25 continues *“East Herts Council will continue to prepare technical work to investigate the options for strategic scale development elsewhere in the District to meet long-term development needs.”* This addresses the recommendation in the draft National Planning Practice Guidance⁷ that *“where the deliverability of critical*

⁶ Review of Planning Inspectors letters and reports at www.eastherts.gov.uk/strategyreport

⁷ Beta Test Version, August 2013

infrastructure is uncertain then the plan should address the consequences of this, including possible contingency arrangements.”

Buffer

4.6.16 National policy requires that a buffer should be added into the plan, as set out in the box below:

National Planning Policy Framework, Paragraph 47

To boost significantly the supply of housing, local planning authorities should...identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land...[Emphasis added]

4.6.17 Paragraph 3.3.7 of the Draft District Plan explains that a buffer has been taken into account as follows: *“the NPPF also requires the provision of an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. A 20% buffer should be applied where there is a persistent record of under-delivery. In East Herts Council’s view there has been no persistent record of under-delivery. Applying a 5% requirement to 4,112 (3,750 need plus 362 shortfall) leaves a buffer requirement of 206 homes in the first five years.”*

4.6.18 In terms of specific deliverable sites for housing, in accordance with NPPF paragraph 47, the Council has allowed for ‘*an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land*’. The Council feels justified in identifying a 5% buffer rather than the 20% also referred to in the NPPF, due to past performance in housing delivery.

4.6.19 Over the run of the last Hertfordshire Structure Plan and 2007 Adopted East Herts Local Plan (1991-2011), housing delivery was 98% of the Development Plan housing requirement: 10,825 homes built from a total requirement of 11,575. Over the same 20 year period, taking into account the requirements of the now abolished 2008 East of England Plan, housing delivery still achieved 93% of the housing requirement.

4.6.20 It is acknowledged that housing completions over the more recent 10 year period 2001-2011 were lower than this, being 85% based on the extant Development Plan and 77% if account is taken of the 2008 Adopted Regional Strategy requirements from 2006. The former

represents 4,696 homes built from a requirement of 5,500, and the latter comprises 4,696 homes built from a requirement of 6,025.

- 4.6.21 It should, however, be noted that in this latter five year period 2006-2011, the District Council had yet to prepare, consult and adopt a revised Plan, based on the increased Regional Plan housing figures, which were 'back dated' two years to 2006. It should also be acknowledged that this period coincided with the worst economic recession in living memory, which severely impacted on the housing market and consequently housing delivery.
- 4.6.22 While annual housing completions may have fluctuated due to a variety of factors and relative to economic and housing market conditions, East Herts has consistently demonstrated, more than five years supply of housing land, relative to Development Plan requirements, since 1991. Such provision only fell below five years from 2009, reflecting the increased housing requirement of the East of England Plan and the economic downturn.
- 4.6.23 The 5% buffer (206) is shown on the strategy worksheet in cell D28. Cells E28 and F28 subtract a total of 206 dwellings (103 in each five-year period) because the buffer is moved forward from later in the plan period. The 5% buffer requirement is included in draft District Plan **Policy DPS3: Housing Supply 2011-20131**.

4.7 Summary

- 4.7.1 The approach set out in the strategy worksheet illustrates the housing strategy for the draft District Plan. The strategy is reflected in the Guiding Principles which sit behind the development strategy, contained after paragraph 3.3.2 of the draft District Plan. The relevant principles here are as follows:

Guiding Principle 1: *To seek to meet the housing requirement within each housing market area, even where local constraints mean that each settlement may not be able to meet its own needs.*

Guiding Principle 3: *To promote self-containment by directing development to areas where there is reasonable proximity to services and facilities, and which reflect existing travel to work areas, school catchments, and retail spend patterns and functional geographies.*

- 4.7.2 The strategy is characterised by a number of key features.

- **flexible:** is not wholly reliant on the provision of development at a single location, but instead identifies a wide range of development locations;
- **meets housing needs locally:** to ensure the long-term sustainability of the plan and support economic development, reflecting the guiding principles of the development strategy;

- **realistic:** phasing is based on realistic build and delivery rates, supported by engagement with landowners and developers and backed up by independent advice from ATLAS;
- **long-term:** provides for a clear understanding of what will happen beyond 2031, directing development to large scale strategic development sites, including three Broad Locations for Development and potentially looking at other locations in the event that evidence comes to light which precludes development in these locations.

4.7.3 The other element of the housing strategy relates to meeting housing requirements across administrative boundaries. This will be addressed further in Section 7: Duty to Co-Operate.

4.7.4 As explained in Section 4.6 above, housing projections should not be misunderstood as targets. The Planning Inspectorate is clear that the projections are the minimum level of development which should be achieved, and should not be seen as an arbitrary cap on development. The District Plan must seek to support financial viability and infrastructure provision, even if this means slightly exceeding the levels of projected need.

5. Green Belt

- 5.1 Having assessed the housing need and the housing supply options in the previous section, it is now necessary to consider whether it is possible to meet those needs without release of any Green Belt sites. Table 5.1 shows the options available without Green Belt release.

Table 5.1: Housing supply excluding Green Belt options

Location	Dwellings
Bishop's Stortford Goods Yard	200
Bishop's Stortford Hadham Road Reserve Secondary School Site	250
Bishop's Stortford North ⁸	2,600
Buntingford South (former Depot)	300
Buntingford North	180
Bishop's Stortford Urban Area (SLAA)	247
Buntingford Urban Area (SLAA)	13
Hertford Urban Area (SLAA)	151
Hertford Mead Lane	300
Sawbridgeworth Urban Area (SLAA)	5
Ware Urban Area (SLAA)	18
Ware Former Co-Op Depot, Star Street	14
Completions	1,082
Commitments	1,572
Group 1 Villages	500
Windfall allowance	1,200
Total supply available without Green Belt sites	8,632

- 5.2 East Herts Council has carefully assessed the conclusions of the reports issued by the Planning Inspectorate⁹. From this, it is clear that housing need constitutes the exceptional circumstances required to release Green Belt through the plan-making process. Since the total supply available is **over 6,000 short** of the projected housing need across the district, it is clear that Green Belt releases will be needed in order to ensure that the District Plan conforms to NPPF requirements. The overall approach to Green Belt is set out in the box below:

⁸ Bishop's Stortford North is included in the table because it is safeguarded land inset from the Green Belt.

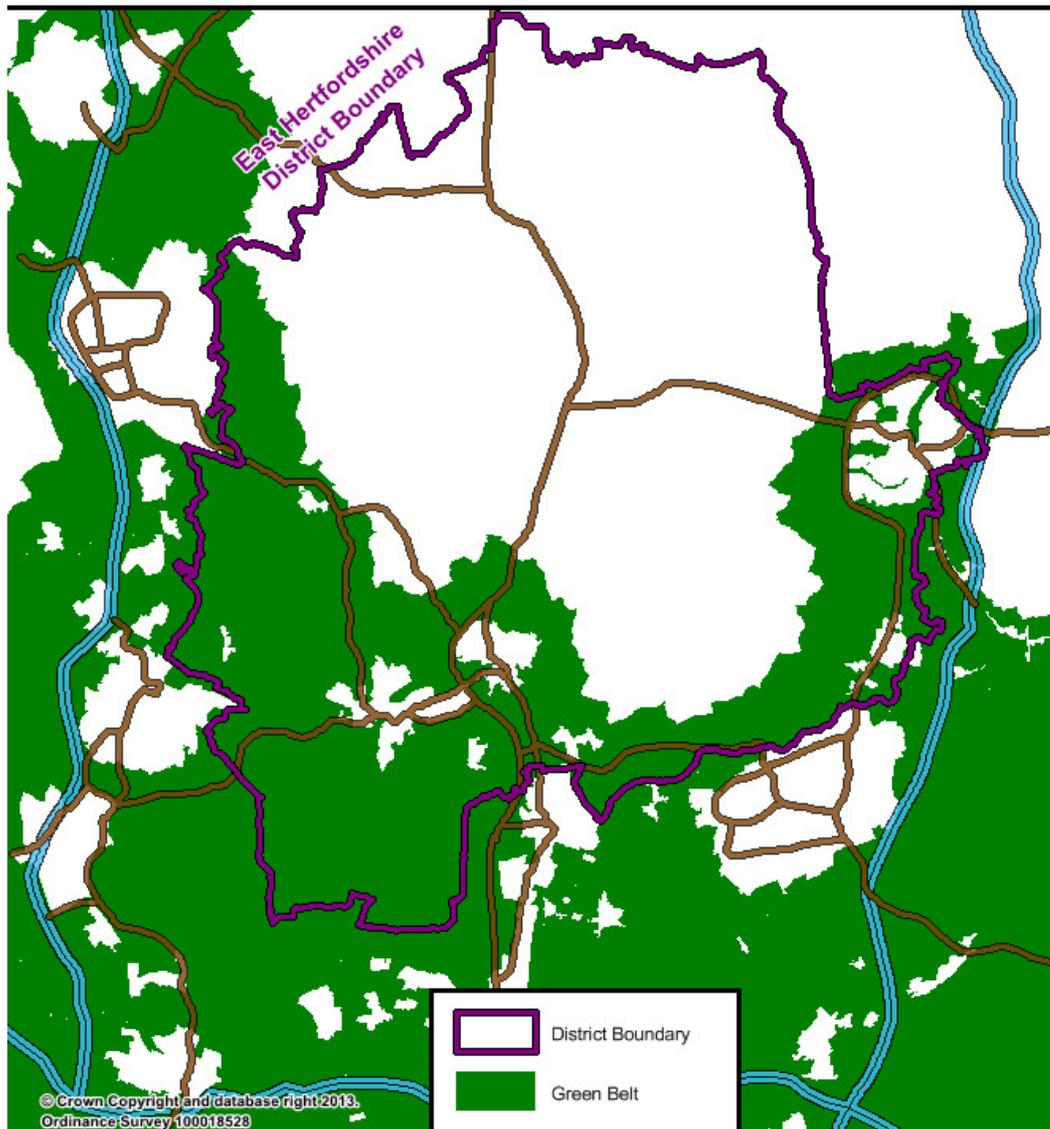
⁹ District Plan Update Report, Essential Reference Paper B: Review of Planning Inspectorate Reports and Letters, East Herts District Planning Executive Panel, 25 July 2013.

National Planning Policy Framework, Paragraph 83

Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

5.3 Figure 5.1 shows the extent of Green Belt in the District and adjoining areas. This shows that apart from Buntingford, the towns of East Herts, and the adjoining towns outside the District, are all encircled by Green Belt.

Figure 5.1: Green Belt



- 5.4 Green Belt therefore acts as a policy constraint to development. Although important, national policy requires consideration of other factors, as shown in the box below:

National Planning Policy Framework, Paragraph 84

When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. [Emphasis added].

- 5.5 Whilst a new settlement beyond the Green Belt could be sustainable in NPPF terms, work on the Supporting Document has shown that a new settlement including the supporting infrastructure is very unlikely to be deliverable within the plan period. Therefore the towns are the most sustainable available locations for the early part of the plan.
- 5.6 The towns are the location of the majority of the shops and services, and the location of railway stations and existing infrastructure where it is possible to extend. Therefore a strategy which sought to direct development to locations beyond the Green Belt purely in order to avoid otherwise suitable locations adjacent to the towns would not comply with paragraph 84 of the NPPF.
- 5.7 For this reason the Council has undertaken a Green Belt Review to assess the current and potential future function of the Green Belt. This informs the Council's decisions in respect of whether any areas of Green Belt would be suitable for release to meet short and long-term needs.

Green Belt Review

- 5.8 The Review is available at www.eastherts.gov.uk/technicalstudies. It consists of 6 parts as follows:

Part 1: High-Level Review
Part 2: Detailed Site Assessment and Boundary Review
Part 3: Major Developed Sites
Part 4: Minor Boundary Amendments
Part 5: Long Term Needs
Part 6: New Green Belt

- 5.9 Part 1 of the Green Belt Review was presented to the District Planning Executive Panel on 3 October 2013, endorsed by the Executive on 5 November 2013, and agreed by Full Council on 11 December 2013.

- 5.10 Parts 2-6 of the Green Belt Review were presented to the District Planning Executive Panel on 3 December 2013 and agreed by Full Council on 11th December 2013.
- 5.11 Landscape character areas were used as a starting point in Part 1 to segment all the Green Belt in the district and create distinct assessment units. Given the very large extent of Green Belt, Part 2 used the shortlisted areas of search from the Supporting Document (summer 2012) to define the extent of the detailed review areas.
- 5.13 **Major Developed Sites (Part 3)** are locations which are washed over by Green Belt (and usually predated Green Belt designation) but where some limited development may be necessary in order to achieve defined objectives. Examples include employment areas and important pieces of infrastructure such as schools and waste water facilities. District Plan Policy GBR3: Major Developed Sites sets out the proposed policy approach these areas.
- 5.14 **Minor Boundary Amendments (Part 4)** result from improvements in mapping technology and are a matter of correcting minor anomalies. These are not of significance to the development strategy and will be reflected on the Policies Map in due course.
- 5.15 **Long-Term Needs (Part 5)** recommends deferral in respect of a designation of any safeguarded land inset from the Green Belt to meet longer term needs, until the development strategy clarifies the extent and location of long-term needs.
- 5.16 From the perspective of the development strategy, the proposed approach to broad locations in the Gilston Area (north of Harlow), North and East of Ware, and East of Welwyn Garden City is considered to provide for longer term needs and therefore there is no need for additional designation of safeguarded land.
- 5.17 In the shorter term, the development strategy contains sufficient flexibility in relation to housing supply. Safeguarded land can only be brought forward as part of a Local Plan review and therefore does not provide a suitable mechanism to adjust the short term housing supply.
- 5.18 Further detail in relation to policy approaches is contained in Section 6 below.
- 5.19 **New Green Belt (Part 6)** recommends deferral of any decision over new (compensatory) Green Belt until the development strategy, and the form of the development locations within it, is better known. Any broad locations within the development strategy will be subject to further work, including an updated Green Belt Review and at that stage it will be clearer how much land is to be released from the Green Belt. The Review will also establish the need, location, and amount of any compensatory Green Belt in order to deliver the development strategy.

- 5.20 From the perspective of the development strategy, the only area of new Green Belt which might be required in the longer term is in the Gilston Area north of Harlow, since any development in this location would be likely to puncture the existing Green Belt.

Green Belt Release

- 5.21 Like all the technical studies prepared to support the emerging District Plan, the Green Belt Review only focuses on a narrow scope, and does not address the issue of housing need or other requirements. The Strategy Report therefore makes the strategic decision about which sites to release, driven especially but not exclusively by the NPPF housing requirements, which the Council's review of Planning Inspectorate reports and letters has shown is taken to form the very special circumstances needed to justify release as part of the plan-making process.
- 5.22 The source of evidence informing the decisions in terms of which sites to release is Part 2 of the Green Belt Review, which looks at detailed site assessments and boundary reviews. The decisions are set out in Table 5.2 below.

Table 5.2: Green Belt release

Location	Green Belt Review Part 2 - recommendations	District Plan - Strategic Decision
Bishop's Stortford North	With the exception of the Hoggate's Wood/Ash Grove Green Wedge, this area is safeguarded land inset from Green Belt. The existing Green Belt boundaries along the A120 and maintaining the Green Belt across the Green Wedge are appropriate.	No Green Belt release is necessary to bring forward an urban extension of 2,600 dwellings in this location. District Plan Policies BISH8 seeks to create a new County Park in the Green Wedge to complement the Green Belt status.
Bishop's Stortford East	The Golf course provides the main role of checking unrestricted sprawl. Retain the main Golf course as Green Belt and release the practice ground and links sites for development.	Release site from Green Belt to provide 150 dwellings to meet local housing needs. District Plan Policy BISH6: East of Manor Links.
Bishop's Stortford South	Green Belt plays an important role in maintaining the countryside character of the area. If release is necessary, strong boundaries would be provided by the road network, including the A1184/St James' Way, the B1259/Thorley Way, and Obrey Way.	Whilst acknowledging the openness of the countryside in this location, given the scale of housing need in the area this site is required in order to meet the requirements of Paragraph 47 of the NPPF. Release site from Green Belt to provide up to 1,000 dwellings to meet local housing needs. District Plan Policy BISH7: South of Bishop's Stortford.
Hertford West	South of Welwyn Road and west of Thieves Lane, woodland could provide a strong boundary. North of Welwyn Road, release as far as the ridgeline. Recommend release area of Green Belt containing Sele School and Hollybush School.	Release area west of Thieves Lane to provide 250 dwellings to meet local housing needs. Release area north of Welwyn Road to provide 300 dwellings to meet local housing need. Boundary to extend west beyond recommended Green Belt Review boundary due to national housing requirements and level of projected need. Adequate buffers with Archers Spring can

Location	Green Belt Review Part 2 - recommendations	District Plan - Strategic Decision
		<p>be provided, and there is an extant permission for a golf driving range with 9m fence on this area. Landscape degraded by significant and prolonged off-road vehicle usage.</p> <p>Sele School and Hollybush School to be removed from the Green Belt and their open areas continue to be protected by Policy CFLR1 Open Space, Sport and Recreation.</p> <p>See also District Plan Policy HERT3: West of Hertford.</p>
Hertford North	Release of southern part of the area of search but avoid encroaching on Waterford Heath and Mole Wood. Protect the allotments with an open space designation.	Release area recommended in the Green Belt Review to address local housing needs amounting to 150 dwellings. See District Plan Policy HERT4: Land North of Hertford.
Hertford South	Release area west of Mangrove Road, including existing residential housing estate currently washed over by Green Belt and the field between this area and the edge of the town to the north. Land to the east of Mangrove Road should be retained owing to its role in safeguarding the countryside from encroachment, taking account of Balls Park, and preventing merging with Hertford Heath.	Release as per Green Belt Review to provide 50 dwellings towards meeting local housing need. See District Plan Policy HERT5: South of Hertford.
Sawbridgeworth West	North of West Road, release Leventhorpe school buildings but retain playing fields in the Green Belt. Release Mandeville School, playing fields, and adjacent field to the west as far as the stream but protect playing	Release area north of West Road for 100 dwellings to meet local housing needs – District Plan Policy SAWB2: Land North of West Road. Release land south of west road for 300

Location	Green Belt Review Part 2 - recommendations	District Plan - Strategic Decision
	<p>fields from development by open space policy. South of West Road, the area west of Chalks Farm as far as the end of the row of houses along West Road serves Green belt purposes the least, but there are no strong potential boundaries. Protect West Road park/play area with open space policy. Retain all other areas in the Green Belt.</p>	<p>dwelling to meet local housing needs. See District Plan Policy SAWB3: Land to the south of West Road. Policy to include structural landscape belt to provide a soft edge and define the new Green Belt boundary.</p>
Ware North and East	<p>To the north, retain Poles Park (Nun's Triangle) in the Green Belt. The area to the north plays a role in maintaining separation with Thundridge and Wadesmill across the A10. Release smaller sites adjoining High Oak Road and Fanhams Hall Road. To the east of Ware, there is a potential new boundary along Wood Lane public footpath as far south as Widbury Hill.</p>	<p>To meet local housing needs, large urban extensions would be needed to the north and east of Ware. However, the Supporting Document identified a number of significant outstanding issues which would need to be resolved before development could be brought forward. To prevent piecemeal development of smaller sites, which would be likely to compromise comprehensive planning of a strategic urban extension in the long term, the whole area will be retained in the Green Belt until after a further Green Belt Review and subsequent Broad Locations Development Plan Document. See District Plan policies DPS4: Broad Locations for Development and WARE3: Land North and East of Ware.</p>
East of Welwyn Garden City	<p>Release of area north of Birchall Lane and west of Panshanger Lane. Panshanger Lane to the east would provide a firm Green Belt Boundary. Establish a landscape buffer around the edges of the woodland.</p>	<p>To meet housing needs including some of Hertford's unmet housing need, this area would be required for development. However, the Supporting Document noted a number of significant outstanding issues which would need</p>

Location	Green Belt Review Part 2 - recommendations	District Plan - Strategic Decision
		to be resolved before development could be brought forward. Therefore the whole area will be retained in the Green Belt until after a further Green Belt Review and subsequent Broad Locations Development Plan Document. See District Plan policies DPS4: Broad Locations for Development and EWEL1: Land East of Welwyn Garden City.
Gilston Area (north of Harlow)	The area meets most of the 5 Green Belt purposes, and the existing Green Belt boundary along the northern edge of Harlow is strong. However, if this area is needed for development a further detailed Green Belt review would be required to look at establishment of a new inner Green Belt boundary. This would be dependent on an understanding of the scale and form of development in the area.	To meet housing needs including the unmet need from the rural area and also unmet housing need from Bishop's Stortford, this area would be required for development. However, the Supporting Document noted a number of significant outstanding issues which would need to be resolved before development could be brought forward. Therefore the whole area will be retained in the Green Belt until after a further Green Belt Review and subsequent Broad Locations Development Plan Document. See District Plan policies DPS4: Broad Locations for Development and GA1: Gilston Area.
Villages	See Green Belt Review Part 2 section 3.4 (page 18-19) for methodology. High Wych, Thundridge, Wadesmill and Watton-at-Stone considered to be only potential Group 1 villages capable of achieving 10% growth. However potential scale and extent of development in the Gilston Area (north of Harlow) and north of Ware is uncertain, and could impact the strategic gaps.	High Wych, Thundridge, and Wadesmill to remain in Green Belt as Group 2 villages but will be reassessed in relation to the Broad Locations in the Gilston Area and North of Ware respectively, as part of a subsequent Development Plan Document (see Chapter 6 below). Watton-at-Stone inset boundary to be

Location	Green Belt Review Part 2 - recommendations	District Plan - Strategic Decision
	Therefore no amendments proposed, except at Watton-at-Stone where inset boundaries should be changed to accommodate 10% development.	amended to accommodate development sites to achieve 10% growth at sites to the north. Retain school site to south within Green Belt.

6. Key Diagram and Policy Approaches

- 6.1 Having established the location of future development, it is necessary to consider the main policy mechanisms by which the development strategy will be implemented. These are set out in the draft District Plan Key Diagram, reproduced at Appendix A. The Key Diagram is not itself policy but assists interpretation of the development strategy. The Policies Map contains the policy areas including policy designations, site allocations, and other policy requirements, and forms part of the statutory plan.

Green Belt and Rural Area Beyond the Green Belt

- 6.3 Green Belt is shown in dark green on the Key Diagram. Green Belt is afforded national policy protection, supported by local policy protection in the District Plan (Policy GBR1: Green Belt). The District Plan development strategy establishes long-term Green Belt boundaries and enables the Council to prevent development proposals in inappropriate locations.
- 6.4 The District Plan uses Green Belt policy to continue to protect and strengthen the network of Green Fingers and Green Wedges in the settlements. These areas also add significantly to the quality of life within each settlement, through the provision of a Green Infrastructure network including both open space and wildlife habitats.
- 6.5 Rural Area Beyond the Green Belt is shown in cream on the Key Diagram. It is a local policy designation (Policy GBR2: Rural Area Beyond the Green Belt) and achieves similar objectives to Green Belt policy in those areas of the District not protected by Green Belt. This policy is an important part of the development strategy, because the openness of the countryside and the character of the historic towns and villages is an important part of the quality of life in the district. In turn this attracts a skilled workforce with a central role in the sub-regional economy.

Site Allocations

- 6.6 Areas shown in red on the Key Diagram will be allocated for development. There is a specific policy for each site allocation within the draft District Plan, together with a site location plan. The boundaries of the allocation are shown on the District Plan Policies Map. At the scale of the Key Diagram it is not possible to show detail, and the site allocations shown include local green infrastructure.
- 6.7 Site allocations are considered to be deliverable, starting development in the period 2016-2021, or in a few cases in the period 2021-2026. Site allocations have emerged through the Supporting Document as the best locations for development to meet national policy requirements in terms of housing need.

- 6.8 As explained above, the policies for site allocations provide a broad framework for consideration of planning applications but it is not within the scope of the District Plan to resolve all the planning issues, which can only be effectively achieved in the context of specific development proposals through the planning application process.
- 6.9 For each of the site allocations the proposed number of new homes is shown on the Key Diagram. The numbers are indicative and will be subject to further testing through the planning application process. The allocations in Bishop's Stortford may be lower depending on the location of additional secondary school capacity.
- 6.10 Two **Supplementary Planning Documents (SPDs)** are proposed for two large site allocations in Bishop's Stortford. These documents will address design and layout and a range of other factors. They will support policies within the District Plan. See Policies BISH7: South of Bishop's Stortford and BISH8: North of Bishop's Stortford.

Broad Locations for Development

- 6.11 On the Key Diagram these are shown by an **orange star** surrounded by an ellipse to indicate the approximate area of focus for further investigation. There are three Broad Locations identified: North and East of Ware, east of Welwyn Garden City, and the Gilston Area located to the north of Harlow.
- 6.12 The main criteria used for selection of Broad Locations as opposed to Site Allocations relate to a number of factors as follows:
- **Availability of defined boundaries:** is a Green Belt Review combined with masterplanning necessary to establish the extent of development?
 - **Infrastructure:** are there major pieces of infrastructure required, for example, new roads or significant improvements to primary routes outside the development area?
 - **5 year land supply:** is there the necessity to bring forward development in this location within the first five years to meet the NPPF's requirement to identify a five year housing supply?
 - **Cross-boundary working:** is it likely that partnership working with neighbouring local planning authorities will be necessary in order to secure a suitable policy framework?
- 6.13 It can be seen from this that scale alone does not necessarily dictate a broad location approach. For example, two large allocations are proposed to the north and south of Bishop's Stortford. Whilst it is unlikely that all the infrastructure issues can be resolved by the District Plan, at the present stage in the process there appear to be a good prospect that the issues can be resolved through subsequent planning stages. For both these locations an SPD is proposed to enable further testing of the mix and layout of development.

Table 6.1: Assessment of Site Allocations versus Broad Locations – based on largest potential development areas

Location and number of dwellings	Availability of defined boundaries	Infrastructure	5 year land supply	Cross-boundary working	Conclusion
Bishop's Stortford North (2,350-2,600)	Clearly defined	Mostly local – Little Hadham bypass desirable as part of the management of the primary route background flow.	Yes	No	Site Allocation
Bishop's Stortford South (750-1,000)	Clearly defined		Yes	No	Site Allocation
West of Hertford (550)	Mostly clearly defined by woodland boundaries	Small-scale infrastructure	Yes	No	Site Allocation
North and East of Ware of Ware (200-3,000)	No clear boundaries – requires masterplanning and Green Belt Review	Possible northern link road and major new sewer	A small part could be delivered but this would jeopardise a comprehensive approach.	No	Broad Location
Gilston Area (north of Harlow) (5,000-10,000)	No clear boundaries – requires masterplanning and Green Belt Review	New bridges across the river Stort, sub-regional transport infrastructure	No – infrastructure lead-in times	Yes	Broad Location
East of Welwyn Garden City (1,700)	Clearly defined	Potential works to the A414 corridor through Hertford	No – infrastructure lead in times and prior mineral extraction	Yes. Potential enlargement of plan area if Welwyn Hatfield Council brings forward adjacent land	Broad Location

- 6.14 At the Broad Locations the principle of development is accepted, but a significant amount of further work is required before the District Council is ready to accept planning applications. A Broad Locations **Development Plan Document (DPD)** will address development at each of the three locations. Each of the Broad Locations will remain in the Green Belt until such time as the District Council adopts the DPD.
- 6.15 The DPD is essentially a Local Plan focused on a specific area. The range of issues to be addressed by the DPD is set out in the following policies:
- DPS4: Broad Locations for Development
 - WARE3: Land North and East of Ware
 - EWEL1: Land East of Welwyn Garden City
 - GA1: Land in the Gilston Area
- 6.16 Examples of the key issues which will be a focus for the DPD include: transport, Green Belt boundaries, social infrastructure including schools, design and masterplanning, financial viability, housing quantum, mix and housing needs, and other cross-boundary strategic issues. A range of dwellings for testing is provided in the relevant policies.

Villages

- 6.17 There are three proposed village groups, two of which are shown on the Key Diagram.
- **Group 1 Villages** are shown as orange dots with a black dot in the centre. These are the larger villages with a wider range of services and facilities¹⁰. These villages will accommodate at least 500 new homes, spread across the villages. Each village will need to accommodate at least a 10% increase in housing stock (based on the 2011 Census) over the 15 year period between 1st April 2016 and 31st March 2031 (draft District Plan Policy VILL1).

Parish Councils will be encouraged to produce neighbourhood plans covering each Group 1 village, which should allocate land for housing. Where monitoring shows a shortfall in the number of homes coming forward through neighbourhood planning during this period, then this will trigger a requirement for the District Council to identify specific sites for housing through a review of the District Plan (see draft District Plan Policy VILL4).
 - **Group 2 Villages** are generally smaller villages where limited infilling (up to five dwellings on each site) and other uses may be

¹⁰ Where there are particular environmental and educational constraints then villages which would normally be considered Group 1 have been classified as Group 2.

permitted. No specific housing requirement has been identified for these villages.

- **Group 3 Villages** are generally amongst the smallest in East Herts, with a poor range of services and facilities. Development in these villages, other than that appropriate in the Green Belt and Rural Area Beyond the Green Belt, would be unsustainable.

Non-residential land uses

- 6.18 The development strategy ensures that residential development is supported by a range of other uses. A range of symbols are shown on the Key Diagram to indicate non-residential land uses.
- 6.19 The symbols are shown indicatively within the broad area because it is not possible to identify the exact location of new employment areas within a development area: this will be addressed through either masterplanning in support of a planning application, through an SPD or through a DPD in the case of the Broad Locations.
- 6.20 New primary and secondary schools are indicated by blue circles containing a **P** and **S**. In Bishop's Stortford the District Plan provides a flexible approach to resolution of the search for a suitable location for a new secondary school. Representing this, three potential school sites are shown with a white circle containing an S.
- 6.21 New employment areas are shown as **purple stars**, and new district centres are shown as **yellow stars**. A district centre is expected to include local shops and a range of other facilities intended primarily for the use of residents of the new development in the site in which the centre is situated. New employment areas are likely to be no larger than 3-4 hectares. Design and layout will be addressed further either through planning applications, SPDs, or the Broad Locations DPD.

Other symbols

- 6.22 The Key Diagram shows three further symbols which are not specifically part of the District Plan but are nevertheless shown because they have an impact on the overall strategy and approach.
- 6.23 The first of these is internationally designated wildlife sites, also known as European Sites, which are governed by the Habitats Regulations Directive. These are shown as **HR** on the Key Diagram. These are located at Epping Forest, Broxbourne Woods, and in the Lea Valley. These are shown because further work will be needed through the Broad Locations DPD in order to assess the impact of air quality and mitigation measures to ensure no deterioration in the sites.
- 6.24 The second is the Harlow Enterprise Zone, shown as **EZ** on the Key Diagram. The Enterprise Zone is important because it is a key part of

the regeneration strategy for Harlow and will be an important influence on the strategy for the Broad Location in the Gilston Area. For example, the capacity of the local transport network and options for local employment opportunities will be influenced by the Enterprize Zone.

- 6.25 Finally, the Key Diagram also indicates three significant highways schemes, including the Little Hadham Bypass, A602 improvements, and improvements to the A414 through Hertford. These are shown as thick black lines. The Little Hadham Bypass and the A602 both feature prominently in Hertfordshire County Council's Local Transport Plan and are the subject of funding bids. They are supported by East Herts District Council. The A414 through Hertford is known to contain a number of pinch points and improvements to the A414 are considered to be an important strategic issue for the plan. All three schemes are expected to feature in the Infrastructure Delivery Plan to be prepared during 2014 to support the District Plan.

7. Duty to Co-Operate

- 7.1 The ‘Duty to Co-Operate’ is contained within the Localism Act 2011 and embedded within the National Planning Policy Framework. The Duty is a legal requirement for local planning authorities to work with other public bodies to their mutual benefit (NPPF paragraphs 178-9). The duty applies particularly to strategic priorities including the homes and jobs needed in an area, infrastructure provision as set out in Paragraph 156 of the NPPF. The main requirements of the duty are set out in the box below:

National Planning Policy Framework

Paragraph 179

Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework.

Paragraph 182

A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development...

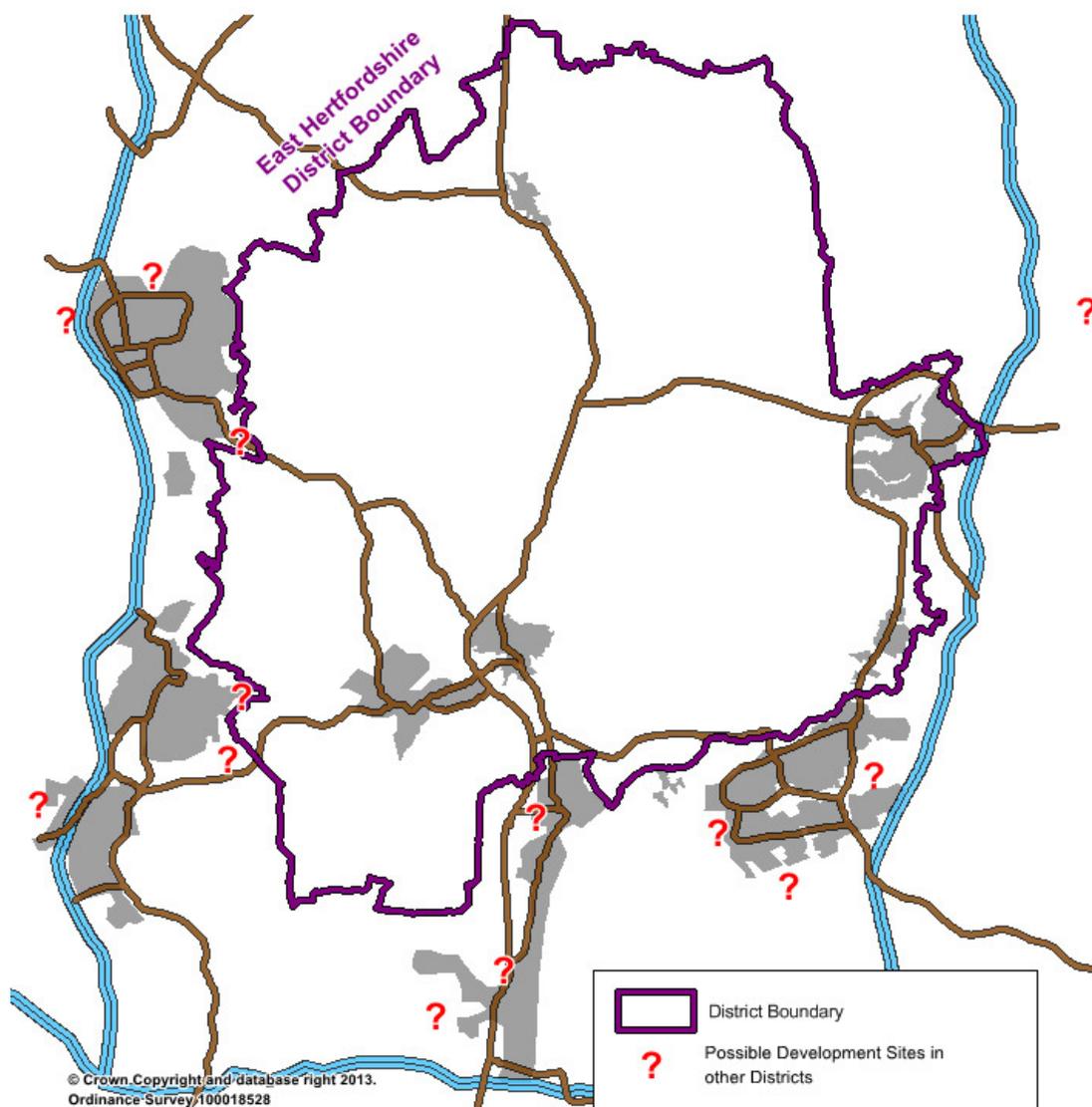
[Emphasis added]

- 7.2 There are two main practical aspects to the Duty to Co-Operate: process and outcomes. **Process** refers to constructive engagement, to actively understand the needs and aspirations of other public sector bodies. **Outcomes** refers to the need to actually achieve a practical way forward, as part of the positive planning approach set out in paragraph 182 of the NPPF. In relation to the outcomes test, Paragraph 182 makes clear that the outcomes and expectations must be reasonable and consistent with achieving sustainable development.

Cross-boundary strategic issues

- 7.3 Whilst the duty applies to a range of public sector bodies, for this early stage in preparation of the District Plan, East Herts Council has had particular regard to cross-boundary issues involving all the neighbouring local planning authorities.
- 7.4 East Herts strategy selection process has been specifically designed to take account of strategic cross-boundary issues. Chapter 4 of the Supporting Document includes a review of the main cross-boundary issues where there are nearby areas of search – at Harlow, Stevenage, Hoddesdon, and at Welwyn Garden City. This information was distributed for comment in September 2012 to all the adjoining local planning authorities and also to officers at Hertfordshire County Council.
- 7.5 A challenge for all Local Plans is to understand development proposals in adjoining districts. At present none of the adjoining districts has a recently adopted Local Plan, and each is at a different stage in preparation of its plan. Figure 7.1 illustrates the location of the main options which appear to be under consideration by adjoining local planning authorities at the current time:

Figure 7.1: Possible development areas in adjoining districts.



Member-Level Meetings

- 7.6 Member-level meetings with the relevant portfolio holders of all the neighbouring authorities have been undertaken at this stage. These meetings identify the major cross-boundary issues. Notes of all the Member meetings have been agreed with all parties and are available on East Herts Council's website at: www.eastherts.gov.uk/dutytooperate.

- 7.7 A brief summary of the main cross-boundary strategic issues at Preferred Options stage is provided below. The review indicates how East Herts Council is seeking to achieve positive outcomes through the draft District Plan.

Broxbourne Borough Council

- 7.8 Portfolio holders and officers met on 29 November 2013 (see meeting note). It is agreed that development in the strategic gap between Hoddesdon and Ware is not appropriate. This was reflected in Chapter 4 of the Supporting Document in summer 2012, when area of search 63: North of Hoddesdon was discounted from further assessment.
- 7.9 The development strategy takes account of the concerns raised by Broxbourne Council in relation to impacts on the A10. East Herts Council acknowledges that a significant proportion of residents and businesses in the broad locations in the Gilston Area (north of Harlow) and north and east of Ware are likely to use the A10 southbound.
- 7.10 Draft District Plan Policy DPS4: Broad Locations for Development takes account of concerns about the impact on the A10, to enable thorough testing and further investigation of mitigation measures through further work on a Broad Locations DPD.

Epping Forest District Council

- 7.11 Portfolio holders and officers met on 21 October 2013 (see meeting note). Epping Forest Council is concerned about the potential impact of strategic development in the Gilston Area (north of Harlow) on air quality in Epping Forest Special Area of Conservation (SAC). These concerns echo the concerns of Natural England. Other concerns relate to access to Junction 7 of the M11 and the additional impact that strategic development in the Gilston Area (north of Harlow) could have, as part of the cumulative impact of growth across the area.
- 7.12 The draft District Plan addresses this issue through the policy mechanism of the Broad Locations DPD, which will enable further consideration of the air quality and transport network issues.

Harlow District Council

- 7.13 Portfolio holders and officers met on 23 September 2013 (see meeting note). The main issue discussed related to the aspirations of Harlow Council to promote regeneration through growth of the town to the north into East Herts District. Harlow Council believes that the benefits of growth to the north go include critical mass and a transformation of

the image of Harlow, as set out in their recent study on the link between regeneration and growth¹¹.

- 7.14 Harlow Council supports large scale growth provided that the necessary supporting infrastructure is in place. Most significantly, this refers to the transport infrastructure, as the Council has concerns about existing and future congestion within the town. The Council supports a new A414-M11 Junction 7a northern bypass to alleviate pressure on the town, although it acknowledges that it is unclear how such a road could be funded.
- 7.15 Harlow Council's concerns are one of the reasons why a large urban extension to Sawbridgeworth is not being taken forward through the East Herts District Plan¹². A strategic extension west of Sawbridgeworth would preclude the development of an urban extension to Harlow north of the Stort valley because of coalescence between development in both strategic development areas.
- 7.16 The Draft District Plan addresses Harlow Council's aspirations and concerns. The Broad Locations DPD will mean that further assessment of the highways and infrastructure impacts can be undertaken, to address Harlow Council's concerns about the impact of the additional traffic on Harlow's congested highways network, and to properly assess the feasibility of a northern bypass to the M11.
- 7.17 Further consideration will need to be given to the issue of unmet housing need in response to the SHMA update prior to submission of the District Plan.

North Herts District Council

- 7.18 Portfolio holders and officers met on 24 April 2013 (see meeting note). The main cross-boundary strategic issue relates to the growth of Stevenage. North Herts Council has previously rejected co-operation with Stevenage in relation to the area of the Stevenage and North Herts Area Action Plan (SNAP) for a large urban extension north and west of Stevenage. However, in light of the Duty to Co-Operate and national requirements in relation to objectively assessed housing need for its own area it may be that North Herts Council will wish to review its own position. A further meeting will be sought at portfolio holder level to clarify the current position.

¹¹ Harlow Future Prospects Study: Linking Regeneration and Growth (Nathaniel Lichfield and Partners, August 2013)

¹² Other reasons relate to the difficulty of integrating large-scale development west of Sawbridgeworth into a sustainable and self-contained development.

Stevenage Borough Council

- 7.19 Portfolio holders and officers met on 30 June 2013 (see meeting note). At this meeting Stevenage Borough Council explained that its preferred strategy was one of self-containment, since North Herts Council had withdrawn its support for SNAP (see above). Stevenage Borough Council is seeking to meet its housing needs to 2031 within its own administrative boundaries. Given the experience with SNAP, the Council is reluctant to proceed with a plan that relies on a neighbouring authority.
- 7.20 Although not specifically requested to by Stevenage Borough Council, East Herts Council undertook a review of the potential for an urban extension of up to 5,000 dwellings east of Stevenage as part of the assessment of 69 areas of search through the Supporting Document (see Chapter 4: Places, area of search no. 60).
- 7.21 The review in the Supporting Document concluded that a large urban extension in this location was not appropriate because a) the area was remote from the transport network of the railway station, A1(M), main employment areas including Gunnel's Wood, and the town centre, and b) because of the impact on the Beane valley, which the landscape character assessment demonstrates is of a particularly remote and tranquil nature.
- 7.22 In both these aspects the area east of Stevenage compares unfavourably with the proposed broad locations in the Gilston Area (north of Harlow) and east of Welwyn Garden City, which are better located and in the case of Welwyn, of significantly less landscape impact.
- 7.23 East Herts Council acknowledges that beyond 2031 Stevenage is tightly constrained by its administrative boundaries. However, East Herts Council's conclusions from the Supporting Document remain valid in relation to strategic scale development. East Herts Council believes that in relation to Paragraph 182 of the NPPF that a large urban extension east of Stevenage is not reasonable or consistent with achieving sustainable development.
- 7.24 For this reason further meetings will be sought in the near future in order to understand the willingness of North Herts Council and Stevenage Council to consider long term options for development to the north and west of Stevenage.

Uttlesford District Council

- 7.25 Portfolio holders and officers met on 28 October 2013 (see meeting note). The main cross-boundary issues relate to transport and economic development. These issues were addressed in the Supporting Document Chapter 4: Places within the section on Bishop's Stortford.
- 7.26 Uttlesford Council's latest emerging Local Plan proposes substantial development at Elsenham and also in the A120 corridor including Great Dunmow. Combined with development put forward in Bishop's Stortford through the draft East Herts District Plan, the cumulative impact on the strategic and local roads in the area is likely to be considerable. The Highways Agency has also drawn attention to the impacts on Junction 8 of the M11, which serves both Districts and Stansted Airport.
- 7.27 To address this, both District Councils are continuing to work with Essex and Hertfordshire County Councils and with the Highways Agency to explore potential mitigation measures. East Herts Council's Delivery Study in 2014 will contribute to an understanding of the financial viability of mitigation measures.
- 7.28 In terms of economic development, both District Councils have agreed that development is likely to increase the prosperity of both districts, subject to the transport impacts noted above. East Herts Council does not object to the proposed large extension of the employment area at Stansted Airport, which would address the needs of different types employment uses (particularly transport and logistics based businesses) to those of the smaller employment areas within Bishop's Stortford.

Welwyn Hatfield Borough Council

- 7.29 Portfolio holders and officers met on 30 November 2012. A second-round meeting was held on 4 December 2013. Notes of both meetings are available on East Herts Council's website. The main issues relate to the potential urban extension to the south and east of Welwyn Garden City.
- 7.30 East Herts Council proposes a mixed-use urban extension to Welwyn Garden City, including a Secondary School, a small employment area, and a neighbourhood centre. The secondary school would serve to meet educational needs not only within the urban extension but potentially also elsewhere within Welwyn Garden City.
- 7.31 At a recent meeting Welwyn Hatfield Borough Council confirmed that an urban extension east of Welwyn Garden City would be consistent with the Borough Council's identification of the area as a site for

Potential Expansion identified in the Borough Council's Core Strategy consultation in November 2012.

- 7.31 Both Councils have discussed the approach to a Broad Locations DPD, and Welwyn Hatfield Council has indicated that it considers this approach to be acceptable. There is the potential to expand the scope of the DPD, should Welwyn Hatfield Council decide to bring forward development on land owned within the locality within Welwyn Hatfield Borough. The DPD approach would allow the transport issues to be investigated further.
- 7.32 The Borough Council is still assessing its level of housing need, but believes that it may be unable to accommodate all of its housing needs within its administrative area. East Herts Council will need to give further consideration to this issue once the Borough Council has confirmed its level of housing need and available sites.

Other Public bodies

- 7.33 East Herts Council has worked closely with a wide range of public bodies, including the Environment Agency, English Heritage, the Highways Agency, Natural England, all of which have commented on emerging positions and site options before consultation on the draft District Plan, and these comments have been taken into account in formulating the draft policies.
- 7.34 The District Council has worked very closely with Hertfordshire County Council. In response to a request from East Herts Council for input to the preferred options, Hertfordshire County Council presented update reports on transport and schools.
- 7.35 Hertfordshire County Council Minerals and Waste Authority has commented on the original 69 areas of search and helped to refine and reduce the original list into a shortlist (summer 2012).
- 7.36 A draft of the Key Diagram has been discussed with an officer from the Local Enterprise Partnership (LEP) during summer 2013.
- 7.37 Regular meetings have been held and are ongoing with the East Herts Association of Town and Parish Councils (EHATPC).
- 7.37 Going forward, there are a number of emerging mechanisms for further consideration of cross-boundary issues as follows:
- East Herts Council is a Member of the Hertfordshire Infrastructure and Planning Partnership (HIPP);
 - The Hertfordshire Duty to Co-Operate Memorandum of Understanding, which has been endorsed by East Herts Council;
 - Continued engagement with Essex authorities including Harlow, Epping Forest, and Uttlesford, as well as Essex County Council and

Hertfordshire County Council, through the established officer-level meetings;

- Round 2 Member-level meetings;
- Engagement through the Local Enterprise Partnership and the Local Nature Partnership.

Other Duty to Co-Operate Issues

- 7.38 East Herts Council is currently undertaking a 'Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment' which will address the issue of cross-boundary needs with adjacent local planning authorities before submission of the plan to the planning inspectorate examination in public.
- 7.39 The Council is also participating in further work with the Highways Agency in relation to Route-Based Strategies to explore the impact of development on the motorway network.

8. Conclusions and Next Steps

- 8.1 The Interim Development Strategy Report has sought to demonstrate how the main components of the development strategy are intrinsic to production of a sound plan. A checklist of requirements is provided in the National Planning Policy Framework, as shown in the box below. This final chapter draws on the information provided in this report to demonstrate how the draft District Plan is making good progress towards achieving a sound report from the Planning Inspectorate.

National Planning Policy Framework, Paragraph 182

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

- 8.2 This chapter seeks to address each of the requirements above and show how the Council is working towards achieving these prior to submission of the District Plan, anticipated late in 2014.

Positively Prepared

- 8.3 Chapter 4 of this report has demonstrated that the plan is based on a strategy which seeks to meet objectively assessed development requirements for the district. The contingency in the housing numbers within the plan, approach to Broad Locations for development provides some flexibility. There is a positive strategy for each settlement and Broad Location set out at the start of the relevant section within the District Plan. These show how the strategy will move forward into implementation stage.

- 8.4 Chapter 7 showed how East Herts Council has worked with adjoining Authorities to understand their emerging plans and their housing and other needs. Further consideration will need to be given to the issue of unmet housing needs prior to submission of the plan for examination in public.
- 8.5 The approach to Broad Locations is considered both positive and pragmatic, in that it acknowledges the principle of development but also recognises the concerns expressed by the transport authorities, which are likely to require a considerable amount of further investigation. The proposed DPD is necessary given the need for a clear process to manage development in the future.
- 8.6 The plan presents a framework for collaborative working and encourages opportunities to do so. Production of the DPDs and SPDs at the appropriate sites will involve collaborative working with a range of stakeholders including landowners and developers, Town and Parish Councils, and key stakeholders. The approach to the villages provides an important and substantive opportunity for Parish Councils to identify appropriate development locations and to draft suitable local policies, for example relating to design, to raise the quality of development.
- 8.7 The Council considers that the approach to the spread and distribution of development is positive. Although unlikely to be universally popular, the strategy recognises the level of housing need cannot be met within the urban areas of the settlements and plans accordingly. Therefore the strategy includes release of a substantial amount of Green Belt land in the most sustainable locations in order to build communities to meet the needs of the future.
- 8.8 The plan has been prepared on a robust evidence base which has been shared with all the adjoining planning authorities from an early stage.

Justified

- 8.9 The approach to the areas of search through the Supporting Document was explained in Chapter 2. All 69 areas were subject to rigorous assessment before the shortlist of options was agreed for further assessment in the later stages of plan-making. The stepped approach is a pragmatic and proportionate approach to addressing a very large number of development options. The approach was endorsed by independent sustainability experts prior to commencement of the assessment.
- 8.10 The Council recognises that plan-making is part of an end-to-end planning process and therefore the amount of detail which can be brought to bear at the level of the development strategy is limited.

- 8.11 The Sustainability Appraisal outlined in Chapter 2 has assessed all the reasonable alternatives before finalisation of the draft plan.

Effective

- 8.12 The provision of a broad range of sites of different sizes and types ensures that there is flexibility in the plan. In the event that there are unforeseen deliverability challenges at particular sites, the strategy is sufficient flexible to accommodate this.
- 8.13 Paragraph 47 of the NPPF makes a distinction between deliverable sites (year 1-5) and developable sites (years 6+). It is to be expected that there is less certainty in the later stages of the plan.
- 8.14 East Herts Council has engaged the Advisory Team for Large Applications (ATLAS) to provide deliverability advice. ATLAS has advised that a degree of uncertainty is inevitable in long-term and strategic scale planning. The task of the District Plan is therefore to provide a framework within which uncertainty can be managed. Given the challenges around transport in particular, the approach to Broad Locations plus a DPD is a suitable policy approach to balancing the requirements for a positive approach with concerns of transport authorities and others in relation to the practicalities of delivery.
- 8.15 The Council itself cannot implement the strategy, but is reliant on willing landowners and developers. All the sites and broad locations proposed in the plan have a willing landowner, and in most cases there are already agreements between the landowner and developers to deliver development. Therefore it is realistic to expect that there are reasonable prospects that building can happen to the timeframe set out in the plan.
- 8.16 East Herts District Council has a clear and transparent process for engaging with adjoining local planning authorities. The Council has given careful consideration to the issue of unmet housing need, taking account of the constrained administrative areas of some neighbours, but also being realistic in terms of how much land can realistically come forward within East Herts over the plan period. Given the flexibility within the strategy, further consideration of this issue will be needed prior to submission of the plan for examination.

Consistent with National Policy

- 8.17 The stepped approach of the Supporting Document has meant that the Council has addressed all the social, economic, and environmental requirements of the NPPF. This has been supplemented by technical studies in those areas requiring additional evidence.

- 8.18 The Council has carefully studied the interpretation of the NPPF as it emerges from the Planning Inspectorate¹³. This information has been used to steer the strategy selection process, and ensure that the plan meets the top-down requirements of national policy.

Next Steps

- 8.19 The draft District Plan is based on a significant amount of research and input both by Members of East Herts Council, officers, and a wide range of other stakeholders who have given up significant amounts of time to provide their inputs to the plan. However, the unveiling of the draft plan is only the start of the process.
- 8.20 Following a 12 week consultation, the Council will need to undertake a considerable amount of further work and further checks prior to submission of the plan to the Planning Inspectorate. In particular, a major area for further work is the area of infrastructure planning, viability testing and delivery. This will involve close working and further input from developers and their consultants, in particular in relation to masterplanning, transport and viability matters.
- 8.21 There will also be the need to continue to work constructively and positively with local communities, neighbouring local planning authorities and other public sector agencies to achieve a satisfactory development strategy and sound plan.
- 8.22 Finally, prior to examination the plan will need to comply with legal and procedural requirements in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. The draft District Plan consultation will be carried out in accordance with Regulation 18. The submission consultation in early 2015 will be carried out in accordance with Regulation 19.

¹³ See Review of Planning Inspectorate Reports and Letters, www.eastherts.gov.uk/strategyreport

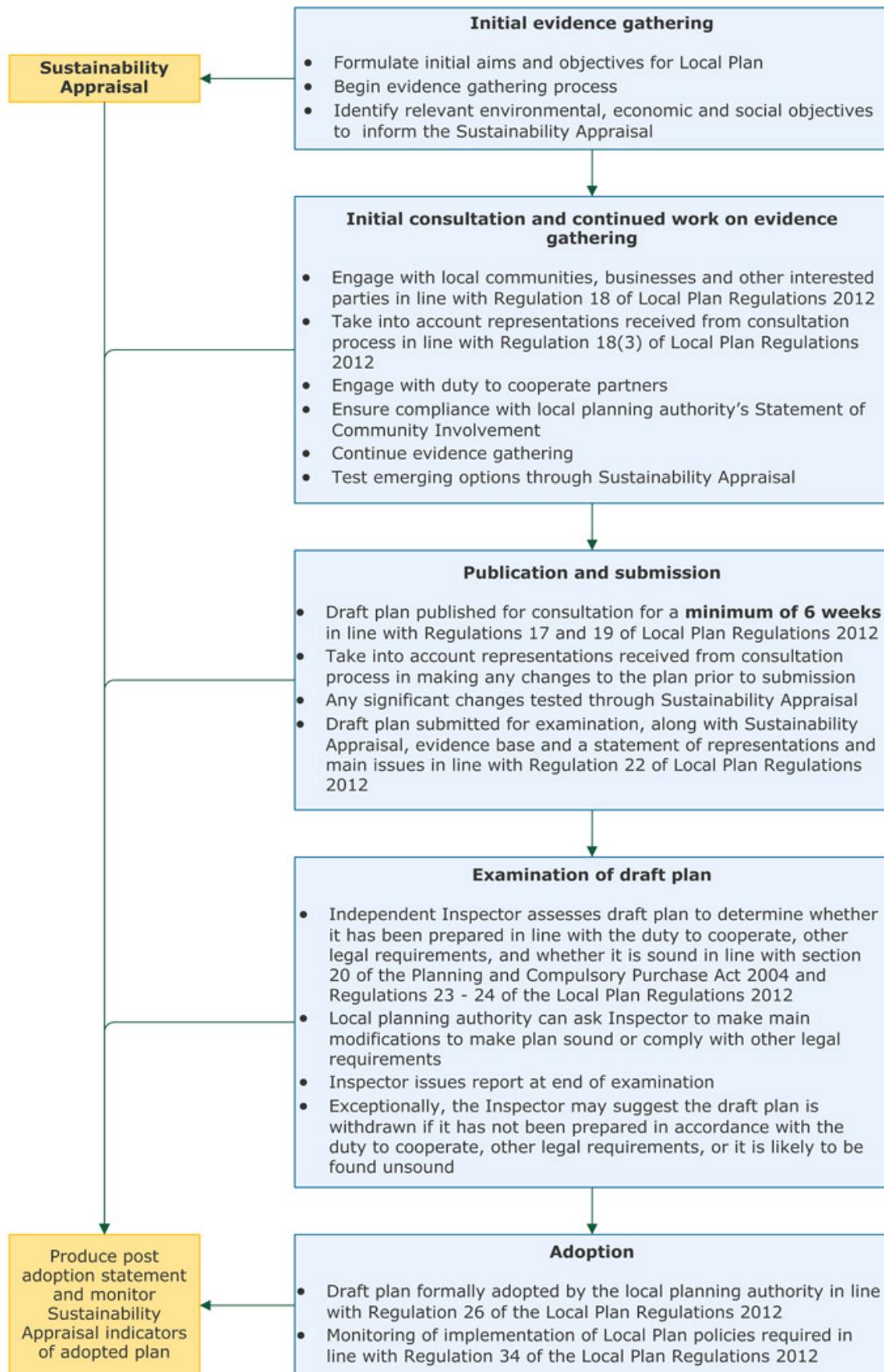
Appendix A: Key Diagram

Available at www.eastherts.gov.uk/strategyreport
and also as an Appendix to the draft District Plan

Appendix B: Strategy Worksheet

Available at www.eastherts.gov.uk/strategyreport
and also as an Appendix to the draft District Plan

Appendix C: Process Diagram



Source: National Planning Practice Guidance
(Beta Test Version, August 2013)

Appendix D: Phasing of Development at Broad Locations

Gilston Area (Broad Location)

Year	11-16	16-21	21-26	26-31	31+
14-15					
15-16	Adopt District Plan DPD				
16-17					
17-18					
18-19					
19-20		Adopt Broad Locations DPD			
20-21					
22			50		
23			150		
24			350		
25			350		
26			350		
27				350	
28				350	
29				350	
30				350	
31				350	
32					350
33					350
34					350
35					350
36					350
5 yr period		0	1250	1750	1750
Cumulative			1250	3000	4750

North and East of Ware (Broad Location)

Year	11-16	16-21	21-26	26-31	31+
14-15					
15-16	Adopt District Plan DPD				
16-17					
17-18					
18-19					
19-20		Adopt Broad Locations DPD			
20-21					
22			50		
23			150		
24			200		
25			200		
26			200		
27				200	
28				200	
29				200	
30				200	
31				200	
32					200
33					200
34					200
35					200
36					
5 yr period		0	800	1000	800
Cumulative			800	1800	2600

East of Welwyn Garden City (Broad Location)

Year	11-16	16-21	21-26	26-31	31+
14-15					
15-16	Adopt District Plan DPD				
16-17					
17-18					
18-19					
19-20		Adopt Broad Locations DPD			
20-21					
22			minerals extraction & restoration		
23					
24					
25					
26					
27					
28					
29				50	
30				150	
31				250	
32					250
33					250
34					250
35					250
36					250
5 yr period		0	0	450	1250
Cumulative			0	450	1700

Appendix E: ATLAS Note on Build Rates

Notes on Build out rates from Strategic Sites (July 2013)

- There will be many influences on a forecast housing trajectory from a strategic site. It will essentially be dictated by the rate of sales that the site's developers want and are able to achieve in light of site conditions, business strategies and wider market demand.
- These notes are focussed on greenfield urban extension/new settlement type projects as opposed to inner urban high density flat/apartment type schemes which have particular build and purchaser considerations. The key influences on greenfield sites include:
 - The location, nature and scale of the site, as well as its layout and phasing approach. This will influence how many separate housebuilders could be on site at any one time;
 - The scale of demand within the wider housing market, General economic conditions such as job security and job mobility, and general consumer confidence about buying/moving, as well as mortgage availability;
 - The business strategy and physical capacity of the homebuilder, Each housebuilder would build out units at a rate that fits their business plan, and short/long term approach to their strategic land portfolios; and
 - The type and variety of products, pricing, and extent of competition from other properties for sale both within the site itself and wider geographic area.
- A large site would typically involve multiple developers who would be active at any one time. The precise number of active sales outlets at any one time could vary, but would typically start with a few (especially when creating a new 'place') and increase over time to a steady state. How many active outlets exist on one site will vary depending on the influences set out above. For well established sites in strong areas this could get as high as 10-15. Some of the larger national builders can even operate more than one outlet off a single site, and running these as entirely separate construction and sales outlets under different brands or aimed at different market segments.
- As the number of separate sales outlets grow, the overall build rate will increase. However, doubling the size, the number of outlets or the number of developers may not directly lead to a doubling of the build rate. Ultimately, there will be a finite number of purchasers able and willing to purchase properties in any particular geographic location irrespective of the degree of range and choice of product that can be made available.
- Recent activity has seen developers limiting the number of unit completions from a single outlet to around 30 units per annum, as this allows them to sustain quality and prices and reduce prelim costs by having a single site

team. When the market was stronger the figure may have been more within the 40-50 range. Whether the market goes back to these levels is debatable. Recent annual reports from the housebuilders have talked about a focus on “margin not volume” and they appear to now take a more measured approach to new supply. However, this approach could change in light of anticipated increase in demand due to measures in the 2013 Budget such as Help to Buy, and the ongoing role of Funding for Lending to stimulate greater bank lending and mortgage availability.

- Our experience indicates that developers and promoters often tend to overstate trajectories and underestimate the timescales required to bring sites forward. Forecasts could be based upon an ambitious “best case scenario” and/or presented in a positive way to fit to Local Authority land/housing supply needs and aspirations. Care is needed to independently verify whether forecast trajectories would be realistic.
- There is available evidence of large site build out rates to enable a considered and reasonable position to be adopted. Current evidence suggests that annual completions on any one site have very seldom gone higher than 500 units pa even under very strong market conditions.
- It is impossible to provide a standard average rate, but evidence would suggest that forecast trajectories for the very largest sites (say 4,000 units+) may be in the range of 300-500 units pa, and for the smaller strategic sites could be more in the range of 150-300 units pa.
- Some specific examples are set out below and in the table at the end of this document.

East of England Research

- A useful research study by Colin Buchanan in 2005 provides a good overview of the progress of large sites (over 1,000 units) across the East of England from 1980 to 2005. This research was commissioned by Countryside Properties and investigated the length of time required to obtain planning permission and begin construction, the time required to fully develop sites, and the maximum delivery rates at specific locations.
- The research showed a very varied picture. The best performing site was Chafford Hundred in Thurrock which peaked at 677 units in 2002/03, albeit the average over that development’s lifetime was only 300 pa. Cambourne peaked at 620 units in 2003/04 with an average of 243 pa.
- The report concluded that the overall rate of development from strategic sites overall was only around 200 dwellings per annum across all the identified individual sites.

Broughton Gate, Milton Keynes

- MK has several large expansion areas that have been building out over recent years and will continue to going forward. It’s Core Strategy was examined in July 2012, with Inspectors Report issued May 2013.

Information on trajectories for strategic sites was produced for and debated at the Examination.

- Of particular note, the Broughton Gate (and adjoining Brooklands) strategic sites with a combined total of 4,000 units, showed average annual completions of 248 pa with a peak of **439 pa**, when there were 15 active outlets on site. Future forecasts set out a peak of max 400 pa.

The Wixams, Bedford

- Wixams is a planned new settlement of 4,500 units being built on the former Elstow Storage Depot, straddling the Borough boundaries of Bedford and Central Bedfordshire Council areas. The proposals comprise of four new interlinked villages, each retaining its own local village character and feel.
- Gallagher Estates are the master developers for the site. The first village under development is known as Lakeview with active developers including Bloor Homes, Careys New Homes, Lagan Homes, Leech Homes, Miller Homes and Taylor Wimpey.
- In terms of completions to date - 8 dwellings completed in 2008/09. 189 dwellings completed in 2009/10. 159 in 2010/11, and 138 in 2011/12. Future completions forecast approx. 200 per year thereafter.

Northstowe, South Cambridgeshire

- This example illustrates the need for caution on adopting an overly ambitious assumption. The original AAP (adopted 2008) included an anticipated housing trajectory of 150 units in year 1 (08/09), then 400 units, 600, then 650 for the following years, 750 for the following two years, then 850. On these assumptions Northstowe should have delivered approx. 2,500 units by 2013. To date it but has delivered none.
- An outline planning application for the first phase (for 1500 units) has recently been approved in 2013, and the accompanying planning statement makes reference to a completion rate of 100 units Yr1 (2014), then 175, then 275 then peak at 360 the following year, then reducing back down. The document acknowledges that as phase 2 comes forward this would maintain a steady level of provision, albeit this is not set out.

Peterborough

- Hampton is a newly developing township in Peterborough, England. There are currently two neighbourhoods within Hampton - Hampton Hargate and Hampton Vale, still growing. A third area, Hampton Hempsted is now under construction and a fourth, Hampton Leys, has been approved
- Analysis from Peterborough Council indicates that there have been a total of 3,793 unit completions in the period Apr 01 to March 12 (an average 345 pa), with 854 for the 3 years Apr 09 – March 12 (285 pa).

Example Site Specific Housing Completions 1996/97 – 2011/12

Note each individual site will have unique locational, physical and delivery contexts. The information below sets out available data from a variety of sources. Users of this information should reflect carefully upon the specific circumstances influencing their local situation.

Local Authority	Site Name	Ref.	Capacity	Average pa	Highest pa	Start	End	96/97	97/98	98/99	99/00	00/01	01/02	02/03	03/04	04/05	05/06	06/07	07/08	08/09	09/10	010/11	2011/2012
Thurrock UA	Chafford Hundred	1	5307	205	677	1988	2005	198	177	356	492	489	675	677	262	163							
Peterborough	Hampton - Southern Township	1.2	5200	321	548	1996		149	95	192	356	456	347	340	378	212		548	265	442	498	210	212
Bedford ¹	Wixams	3	4500	265	496	2008														8	198	356	496
Milton Keynes	Broughton Gate & Brooklands	4	4000	281	439	2005											115	439	236	261	439	197	
Colchester	Highwoods	1	3910	77	257	1982	2004	173	252	257	156	88	70	196	40								
Basilidon	The Wick, Wickford	1	3555	93	306	1990	2004	190	306	157	157	218	78	125	76								
Harlow	Church Langley	1	3528	167	513	1992	2004	397	466	513	316	158	66	49	35								
South Cambridgeshire	Cambourne	1,6	3300	234	620	1998				126	126	127	213	337	620	151	377	267	219	191	161	206	154
Suffolk Coastal	Grange Farm	1	3150	83	146	1990	2005	146	146	146	146	146	146	146	146								
South Glos	Emersons Green Village Area	5	2870	358	564	1996		161	508	524	564	564	242	160	142								
Broadland	Thorpe Marriot	1	2854	79	279	1988	2000	279	205	219	157	171											
Stevenage	Great Ashby	1	2191	184	319	1998	2005			30	204	319	310	246	100	81							
Braintree	Great Notley Garden Village	1	1766	131	282	1993	2004	195	215	133	84	271	193	282	70								
Huntingdonshire	Loves Farm, St Neots	6	1400	215	336	2008													34	186	336	302	216
Ipswich	Ravenswood	1	1200	136	226	1999	2005				5	200	60	226	145	182							
Aylesbury ³	Fairford Leys (Coldharbour)	7	1200	133	349								50	220	349	285	170	105	10	6	1		

SOURCE REFERENCES:

- Housing Delivery on Strategic Sites Research Study, Colin Buchanan, 2005
- Planning Policy Monitoring, Peterborough Council (http://www.peterborough.gov.uk/planning_and_building/planning_policy/planning_policy_monitoring-1.aspx)
- Annual Monitoring Report, BDC (https://www.bedford.gov.uk/environment_and_planning/planning_town_and_country/planning_policy/annual_monitoring_report.aspx)
- Core Strategy: Housing Technical Paper, MKC, 2011. (http://www.milton-keynes.gov.uk/planning-policy/documents/Housing_Technical_Paper_24.3.2011.pdf)
- Assessment of Deliverable Housing Sites, BNP Paribas for SCDC, 2013 (https://consultations.southglos.gov.uk/gf2.ti/f/251202/10215685.1/PDF/-/BNP_Paribas_Assessment_of_Deliverable_Housing_Sites.pdf)
- Major Housing Development, Cambridgeshire CC (<http://www.cambridgeshire.gov.uk/NR/rdonlyres/3506BA52-AC5F-436E-A562-D3DBCCEC4109/0/Mar13CambridgeshireMajorHousingCompletionsandCommitments.xls>)
- Housing Completions, AVDC (<http://www.aylesburyvaledc.gov.uk/local-development-plans/planning-policy/monitoring-info/>)

Appendix F: Interim Sustainability Appraisal Findings

This section forms an extract from Chapter 11 of the Interim Sustainability Appraisal by URS Corp, January 2014.

Identifying alternatives

The **preferred approach** involves planning for a total of 15,932 as follows:

- *Allocating* land for 5,580 homes, primarily at urban extensions but also at a small number of particularly significant sites within the urban areas;
- Identifying *broad locations* for 5,250 homes to 2031 that will be a focus of further work with a view to allocating sites through a subsequent plan; and
- Supporting 5,102 homes to come forward through other sources of supply.

The breakdown of these figures is provided in the table below

Site / broad location	Total 2011-2031
Bishop's Stortford Goods Yard	200
North of Bishop's Stortford	2,600
East of Bishop's Stortford	150
South of Bishop's Stortford	1,000
Buntingford South (former Depot)	300
Buntingford North	180
North of Hertford	150
South of Hertford	50
West of Hertford	550
West of Sawbridgeworth	400
Site allocations total	5,580
Gilston Area (north of Harlow)	3,000
East of Welwyn Garden City	450
North and East of Ware	1,800
Broad locations total	5,250
Windfall allowance (towns only)	1,200
Completions	1,082
Commitments	1,572
Villages	500
Bishop's Stortford Urban Area	247
Buntingford Urban Area	13
Hertford Urban Area	451
Sawbridgeworth Urban Area	5
Ware Built-Up Area	32
Other supply sources total	5,102
GRAND TOTAL	15,932

The starting point for identifying alternative approaches was the question of **housing quantum**, i.e. the number of new homes necessitated. The evidence-base points strongly towards a need to deliver **at least 15,000 homes** over the plan period in order to meet objectively assessed needs.

A **lower growth approach** would not meet objectively assessed housing needs. The NPPF establishes that authorities may plan for less than objectively assessed need only if neighbouring authorities are in a better position to accept that need (and agree to accept the unmet need). This is not the case for East Herts; and, as such, a lower growth approach is not 'reasonable' and need not be the focus of SA.

It is, however, reasonable that a **higher growth approach** is tested, i.e. reflected in one of the alternative approaches that are the focus of SA. There is potentially a scenario whereby the unmet needs of neighbouring authorities must (in accordance with the Duty to Cooperate) be accommodated.¹⁴ Subsequent to considering the question of alternative growth quantum, there was a need to consider the question of **spatial approach**. The following are strategic considerations that were taken into account when identifying reasonable alternatives:

- **Brownfield/greenfield:** Available brownfield sites are few in number. As such, a greater focus on brownfield land is not a reasonable alternative.
- **Green Belt:** Theoretically it might be possible to accommodate 15,000 dwellings in those areas to the north of the district that are not designated Green Belt; however, a focus on development in the north of the district is far from ideal in many respects. In-light of this, an option is presented below (as 'reasonable') that would involve avoiding urban extensions into the Green Belt and instead delivering 10,000 dwellings in the Gilston Area. Despite part of this area being in the Green Belt (and despite there being question-marks around deliverability of growth here at this scale) the '10,000 homes in the Gilston Area' option is considered more realistic than other comparable (i.e. non-new settlement) options for development outside the Green Belt.
- **Scale of developments:** A strategy that concentrates growth at a small number of large developments is preferable to a dispersal approach.¹⁵ Development at scale helps to achieve a degree of self-containment, not least because development becomes more financially viable and hence there becomes greater potential to fund the delivery of infrastructure.
- **Urban areas:** It is not necessary for the alternatives to reflect a range of approaches to development of the many sites within the urban areas, i.e.

¹⁴ There is much uncertainty regarding whether or not East Herts is in a better position than neighbouring authorities to accept growth. Work is ongoing to consider the 'deliverability' of higher levels of development.

¹⁵ Dispersal approaches were considered as part of the 2010 Issues and Options consultation (and within the Interim SA Report published alongside the consultation document).

it is appropriate for the approach to development within urban areas to be common across all alternatives. These sites are inherently less contentious from a 'sustainability' perspective, and the Strategic Land Availability Assessment (SLAA) work undertaken points clearly to a preferred approach.

- **Villages:** Early work on plan development (see, for example, the Interim SA Report presented alongside the Issues and Options document in 2010) drew attention to the weaknesses of the 'focus large volumes of growth at villages' option on the basis that villages are associated with limited services and entrenched 'car dependency'. The preferred approach of focusing 500 dwellings in the villages is therefore common to all options.
- **Greenfield allocations:** A number of greenfield allocations on the edges of the market towns are included in the preferred approach, ranging in scale from 50 dwellings to 1,000 dwellings. Notwithstanding site-specific matters, there are broad similarities between each of these locations as they relate to strategic sustainability considerations. As such, the approach to greenfield allocations is common across all of the alternatives except one (which reflects an approach whereby there are no greenfield allocations).
- **Broad locations (scale):** The appropriate scale of development at the three preferred Broad Locations is uncertain due to deliverability complications, and sustainability considerations. Therefore testing of different scales of development is appropriate. That said, it is known that scale thresholds exist (roughly) that must be reached if necessary infrastructure is to be delivered.
- **Other large urban extensions:** The Supporting Document identifies two locations for urban extensions - East of Stevenage and West of Sawbridgeworth - which are not reflected in the preferred approach. The choice of location for urban extensions has important sustainability implications, and hence it is important that alternatives vary in this respect.
- **New settlements:** There are major uncertainties around the deliverability of strategic scale development at the three preferred Broad Locations (and other possible locations for strategic scale urban extensions). The intention is for further work to be undertaken through a Broad Locations DPD with a view to overcoming constraints; however, it may transpire that there are fundamental constraints that cannot be overcome, in which case a new settlement (or more than one new settlement) will be necessary in order to ensure sufficient housing supply. At this stage no specific new settlement option is near to being considered deliverable, and in most cases the land has not even been put forward for consideration; however, it is reasonable for 'the new settlement option' to be appraised. Rather than arbitrarily picking one of the possible new settlement locations, the option that is the focus of

appraisal is ‘a new settlement in a transport corridor’. This approach is sufficient to allow comparable / meaningful appraisal.

Taking account of the above considerations, seven alternatives to the preferred approach were developed, making eight alternatives in total. These are shown in the table below. N.B. All eight assume 5,102 dwellings from ‘other’ supply sources.

Alternative options for appraisal

Option	Total housing growth	Allocations	Broad locations
1*	15,932	5,580 homes	3,000 homes in the Gilston Area 1,800 homes North and East of Ware 450 homes East of Welwyn Garden City
2	15,382	5,580 homes	1,700 homes East of Welwyn Garden City 3,000 North and East of Ware
3	15,382	5,580 homes	1,700 homes East of Welwyn Garden City 3,000 homes West of Sawbridgeworth (with a bypass)
4	15,682	5,580 homes	5,000 homes East of Stevenage
5	15,682	5,580 homes	5,000 homes in the Gilston Area
6	15,682	5,580 homes	5,000 homes at a new settlement in a transport corridor
7	15,102	0 homes	10,000 homes in the Gilston Area
8	25,382	5,580 homes	1,700 homes East of Welwyn Garden City 3,000 homes North and East of Ware 10,000 homes at In the Gilston Area

*The preferred approach

The following commentary on each of the options supplements the justification text provided above.

- **Option 1** is the preferred approach and hence must be appraised (alongside alternative approaches).
- **Option 2** involves ‘maximising’¹⁶ growth at two of the Broad Locations - East of Welwyn Garden City and North and East of Ware – at the expense of growth in the Gilston Area.
- **Option 3** follows the same principle as Option 2 but instead tests the discounted option west of Sawbridgeworth, with the provision of a bypass.
- **Option 4** tests the concept of an urban extension East of Stevenage, despite this option having been previously discounted through the Council’s strategy selection process as set out in the Supporting Document.
- **Option 5** tests the concept of development in the Gilston Area without development at the other Broad Locations.

¹⁶ i.e. this is the scale of growth that is possibly deliverable. Certainty around delivery on this scale before 2031 is, however, relatively low.

- **Option 6** tests the concept of a new settlement in a transport corridor. The indicative, 'non-location-specific' nature of the option is appropriate at this stage, given the paucity of available evidence in relation to specific locations.
- **Option 7** enables testing of a) a higher level of development in the Gilston Area and b) no urban extensions to the market towns. This option is also indicative. It is recognised that such extensions are, in fact, necessary in order to ensure housing supply in the short-term.
- **Option 8** enables testing of higher levels of growth which might result if the Council has to accept the unmet need of other districts. This option is also indicative. It is recognised that there are potentially numerous ways of achieving a 15,000 home target.

It is important to emphasise that, whilst there are other options that could be appraised, it would not be appropriate ('reasonable') to appraise more than eight in total given the need to ensure accessibility / engage the public. The range of alternatives is sufficient to 'tease out' all of the key sustainability issues / arguments. It may be that the final preferred approach does not precisely reflect any of the eight alternatives, but is justified on the basis of the alternatives appraisal nonetheless.

Alternatives appraisal findings and Council response – by Topic

SA Topic	Alternatives appraisal findings	Council response
Air quality	<p>The impacts on the Air Quality Management Areas in Bishop's Stortford, Hertford, and Sawbridgeworth is the main concern, and therefore the Preferred Option (Option 1) performs less well, although some mitigation measures may be feasible. The best option would be to concentrate development with high levels of self-containment and avoid the towns with AQMAs (Option 7, followed by a new settlement in a transport corridor - Option 6). Sawbridgeworth bypass could avoid the AQMA there (Option 3). Higher levels of growth (Option 8) are more likely to be detrimental. A lower level of growth at the Gilston Area (Option 5) is less likely to fund a Harlow Northern Bypass (A414-M11) which could channel traffic onto the M11 and away from the European Sites in the Lea Valley, Broxbourne-Hoddesdonpark Woods and Epping Forest.</p>	<p>The impact on the Bishop's Stortford and Sawbridgeworth AQMAs will be studied further through the Urban Transport Plan during 2014, and on Hertford through the A414 study due to report in Spring 2014.</p> <p>Whilst AQMAs are considered to be important, the Council is not aware of examples where the Planning Inspectorate has sought to reject growth options on this basis.</p> <p>The provision of an A414-M11 northern link road would have air quality benefits but the deliverability is uncertain. The Broad Locations DPD should assess this in more detail. A Sawbridgeworth Bypass would not address the Duty to Co-Operate with Harlow.</p> <p>A final Habitats Regulations Assessment will be undertaken prior to examination of the District Plan, to understand the impacts on the European Sites.</p>
Biodiversity and green infrastructure	<p>Much of the biodiversity and leisure interest lies along the river corridors which are protected under all the options. There are relatively low levels of differentiation because all the development options involve some development in the vicinity of areas of biodiversity, and all involve some development on agricultural fields low in biodiversity. Therefore</p>	<p>The Supporting Document shows how the development strategy has been prepared to reflect the impacts on the hierarchy of designations (NPPF Paragraph 113). As the SA points out, green infrastructure can mitigate impacts, and the draft policies (topic-based and settlement level) require this. Green Wedges and Green Fingers are a key</p>

SA Topic	Alternatives appraisal findings	Council response
	<p>more detailed site-specific consideration will be necessary during future planning stages, which will also need a sustainable drainage strategy to minimise run-off risks to sensitive sites, for example Hunsdon Meads SSSI and the Lea Valley.</p> <p>Option 6 (new settlement) could perform well if a suitable site can be found. Higher levels of growth in the Gilston Area (Options 7 and 8) perform least well because there is a risk that it could impinge on the streams through the area, although this could be mitigated through careful design. Although there is an option avoiding development at the edges of the market towns (Option 7), this would not perform better than the other options given the assumption that biodiversity interest would be preserved through appropriate green infrastructure.</p>	<p>part of the development strategy. Masterplanning and layout will be further considered through DPDs and SPDs.</p>
Climate change	<p>Larger sites have better potential for clean energy infrastructure and better prospects for self-containment to reduce out-commuting and therefore lower vehicle emissions.</p> <p>West of Sawbridgeworth (Option 3) would likely be less self-contained. Concentrating growth in the Gilston Area (Options 7 and 8) would support self-containment and delivery of clean energy infrastructure.</p>	<p>The District Plan is set to contain policies to promote low carbon heating, particularly at the larger development locations. Masterplanning of development to increase self-containment and design in low carbon technology will be a feature of the Broad Locations DPD.</p>
Community and wellbeing	<p>Options are assumed to perform better where the effect would be to support provision of new or better facilities, or enable existing facilities to</p>	<p>It is acknowledged that East of Welwyn Garden City will look to that town for many of its services. This is a part of the Duty-to-Cooperate in terms of</p>

SA Topic	Alternatives appraisal findings	Council response
	<p>perform better.</p> <p>Option 8 (high growth) performs well as it provides for new facilities across the district. Option 2 performs next best because it could provide facilities in the Gilston area, Ware, and Welwyn Garden City, followed by Option 3 (Welwyn Garden City and Ware but not the Gilston Area). Options 3, 4, 5, and 6 which do not provide an urban extension North and East of Ware for new schools in the Hertford/Ware catchment perform poorly. Option 3 is ranked below Option 2 because there are doubts of the ability of a small town like Sawbridgeworth to provide substantial facilities, even with high levels of growth. Option 7 (avoid urban extensions) performs poorly as it would not provide opportunities to enhance community facilities through development.</p>	<p>cross-boundary strategic priorities and will need further work with Welwyn Hatfield Borough Council. Agreed that the new school capacity at Ware is likely to be a significant issue. This will be assessed further through the Broad Locations DPD.</p> <p>Agreed that Option 7 (avoiding urban extensions to the towns and focusing on the Gilston Area) would have negative impacts and this supports the proposed development strategy.</p> <p>Whilst Option 8 could perform well in terms of this topic, the Interim Development Strategy Report finds that deliverability of this level of development to look very doubtful.</p>
Economy & employment	<p>Options which enable a spread of employment opportunities in viable locations are assumed to perform well. In particular, it is important to consider that the A414 is a key connective transport route between the life science industries stretching from Harlow, Ware, and Welwyn Garden City through to Stevenage; and that Bishop's Stortford is an attractive location given its proximity to the M11 and Stansted Airport.</p> <p>- Option 8 performs best, followed by Option 2 and then Option 1. The Gilston Area (Option 5)</p>	<p>The Strategy Economic Development Advice (DTZ, 2012) shows that East Herts functions primarily as a source of labour and is generally not well suited as a location of new strategic business parks. The study also drew attention to the increase in service jobs outside employment areas which results from housing development and greater population.</p> <p>Agreed that Sawbridgeworth is not an attractive location for a new employment area and therefore a large urban extension (Option 3) is not appropriate.</p> <p>Agreed that Bishop's Stortford is the premier</p>

SA Topic	Alternatives appraisal findings	Council response
	<p>performs better than the East of Stevenage (Option 4) because it is closer to the main employment areas and therefore more viable. A new settlement (Option 6) may not be as viable as opportunities closer to existing employment clusters. West of Sawbridgeworth (Option 3) is not an attractive location for business. Option 7 would not capitalise on opportunities for employment growth at Bishop's Stortford.</p>	<p>location in the district for new employment due to its links to Stansted Airport. Each urban extension would have the potential to build in a mixture of uses, thus providing small scale employment opportunities. Hence Option 7 performs poorly in this respect as these opportunities would be lost. Whilst Option 8 could support significant employment the DTZ study identified the relative lack of attraction of the Gilston area for a strategic business park due to distance from the M11. It also drew attention to competition with the Harlow Enterprise Zone. However, the A414 east-west is a key strategic corridor; albeit congestion is a consideration.</p> <p>Given the existing high level of out-commuting, a high growth option would need to create considerable new employment opportunities to counter this or at least retain the status quo. The approach to a Broad Locations DPD potentially enables new employment and mixed-use development in locations close to the A414, subject to satisfactory resolution of the transport impacts.</p>
<p>Historic Environment</p>	<p>Historic assets such as scheduled monuments and listed buildings can be protected through sensitive design and layout regardless of the broad spatial strategy. However, if the topic is extended to include the setting of towns then some differentiation between the alternatives is possible.</p>	<p>The preferred sites and broad locations have been selected to minimise impacts on the historic environment. For example, Historic Parks and Gardens have been avoided, as explained in the Supporting Document. Some impact on the setting of towns is inevitable.</p>

SA Topic	Alternatives appraisal findings	Council response
	<p>'Concentration' options would potentially impact places less.</p> <p>On this basis, the options for 5,000 dwellings East of Stevenage, in the Gilston Area, and at a new settlement, are all likely to perform similarly well. Option 7 also performs well on the basis that urban extensions to market towns would be avoided; however, focusing in the Gilston Area would lead to impacts on Sawbridgeworth and would affect the original urban form of Harlow. A large urban extension to Ware (Option 2) and Sawbridgeworth (Option 3) would be out of character. Under the preferred approach North and East of Ware (1,800) there will be a need to pay careful attention to historic assets, e.g. Fanhams Hall.</p>	<p>The Broad Locations DPD will pay careful attention to the treatment of Fanhams Hall.</p> <p>The topic-based policies and settlement-specific policies provide a framework for sensitive treatment of historic assets, for example including buffer areas and incorporating assets within green infrastructure.</p> <p>Finally, it is important to consider that the District Plan is a way to protect the historic character of the District given the threat of 'planning by appeal' at the Market Towns without a plan in place.</p>
Housing	<p>Options which achieve a spread of housing across the housing market areas to meet need within each area perform better.</p> <p>Options 1 and 8 could meet the needs of two wider housing market areas including settlements outside the district, whereas Options 2, 3, 4, 5, and 7 have the potential to meet the needs on only one, and Option 6 (new settlement) could meet the needs of none. Option 8 (high growth) would deliver most housing in addition and also potentially meet the needs of another area and therefore performs best. Option 7 (focus on the Gilston Area and avoid urban extensions to market towns) performs worst.</p>	<p>The Interim Development Strategy Report includes a section on the Duty to Co-Operate which looks at the issue of unmet housing need across district boundaries. East Herts Council will need to work with Stevenage and North Herts Councils to assess suitable long-term growth locations to meet Stevenage's needs beyond 2031. Further discussions will be needed with Harlow and Welwyn Hatfield Councils in relation to unmet needs and the proposed Broad Locations.</p>

SA Topic	Alternatives appraisal findings	Council response
Land	<p>All options would require significant release of greenfield sites since the supply of brownfield and other urban land is very limited. All options except Option 6 require extensive release of Green Belt sites. Therefore Option 6 performs best (on the assumption that a new settlement would be located outside the Green Belt). Option 7 would require the next least amount of Green Belt release although this is a highly significant part of strategic Green Belt including the Stort Valley. Option 8 would require the most Green Belt release and therefore ranks worst. All options would result in loss of areas of Grade 2 agricultural land.</p>	<p>Option 6 (new settlement) is not considered realistic at this stage, since the land is not proposed in most cases and in all cases the infrastructure planning has not yet even reached infancy. Paragraph 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when reviewing Green Belt boundaries.</p> <p>It is acknowledged that all options would result in the loss of Grade 2 Agricultural Land. Within each classification there are pockets of good and poor quality agricultural land. It is therefore necessary to ensure the DPD approach makes provision for the assessment of specific sites, mitigation measures and improvements to adjacent land where necessary.</p>
Landscape	<p>Key considerations are the quality and openness of the landscape, taking account of the Landscape Character Assessment (2007).</p> <p>Option 7 performs best because it concentrates development away from the majority of character areas, although impacts in the Gilston Area would be significant. A new settlement (Option 6) could choose a site to limit landscape impacts, although this would need to be subject to site-specific assessment. Other options are all likely to encroach into some attractive open countryside. East of Stevenage (Option 4) performs poorly due</p>	<p>The Council acknowledges that there will be unavoidable landscape impacts given the scale of the housing requirement. There is no reasonable alternative that would avoid impacts, and some would lead to impacts over and above the preferred approach. The preferred approach protects the most valuable landscape areas, for example the Beane Valley and the Stort Valley.</p> <p>District Plan policies require that design and layout, masterplanning, green infrastructure and landscaping minimise the impacts as much as possible.</p>

SA Topic	Alternatives appraisal findings	Council response
	to impact on the sensitive Beane Valley.	<p>The Broad Locations DPD will need to give careful consideration to these issues as part of a masterplanning exercise.</p> <p>Additional site-specific impacts the Council is aware of include the sloping landscape south of Bishop's Stortford.</p>
Transport	<p>Larger developments (i.e. those of at least 5,000 homes) providing more services and facilities, and those better linked into existing settlements, are more likely to be self-contained, reducing the need to travel by car.</p> <p>Option 7 concentrates development at a 10,000 home development and so performs best in some respects. A concentration of growth in the Gilston Area (Option 5) is preferable to East of Stevenage (Option 4) in terms of connectivity. Options 1 and 2 are not ideal in that they would not concentrate development to a great extent, i.e. no single 5,000 home development is proposed. However, these options have the potential to create developments that are well-connected to existing towns and services. Sawbridgeworth (Option 3) is a small town with low potential for significant self-containment, even with a bypass. A distinct new settlement (Option 6) distant from other towns and (most likely) a railway station is assumed to perform poorly.</p>	<p>The feasibility of self-containment will need to be explored further through the District Plan. The separate transport assessments (see the Transport Update, November 2013) draw attention to the impacts of additional traffic on the network. The SA provides a different perspective.</p> <p>The Broad Locations DPD introduces safeguards which mean that very large options will not come forward until a robust framework for managing the transport impacts is in place.</p> <p>Deliverability of transport issues is a difficult issue for plan-making. Working with Hertfordshire and Essex County Councils and the Highways Agency, the Council will undertake a number of additional studies to further assess transport impacts prior to the submission stage.</p>
Water	There may be greater potential for sustainability	The Council has worked closely with the

SA Topic	Alternatives appraisal findings	Council response
	<p>features including rainwater harvesting at very large sites. Option 7 performs well on this basis. Option 8 would result in a greater level of development and so could cancel out this efficiency gain.</p>	<p>Environment Agency and the water companies on the issue of the environmental impacts of low-flows in rivers. Water supply is a national policy issue involving a trade-off between the consumer price of water (championed by OFWAT) and the environmental impacts (championed by the Environment Agency). This trade-off can only be addressed at the national level. The Council proposes to introduce water efficiency requirements through the District Plan to address this issue as far as the remit of the local planning authorities allows. The Council is not aware of any cases where the Planning Inspectorate has reduced levels of development because of water supply concerns.</p>

Key findings for each option and the Council's response

Option	Key appraisal findings	Council Response
<p>1: Preferred Option</p>	<p>This option (the preferred approach) would result in some negative impacts on the landscape North and East of Ware and in the Gilston Area (as well as at some of the locations allocated for housing surrounding the market towns). Some negative impacts on air quality are also likely. Importantly, this option would enable the benefits of development, including new jobs as well as homes, to be spread around the District where they are needed.</p>	<p>It is acknowledged that there will be some negative impacts associated with implementing the preferred option; however, these are outweighed by the benefits. In terms of air quality, the Council will work with Environmental Health and Transport authorities to further understand the impacts and potential mitigation measures. The commitment to a Broad Locations DPD provides a safeguard to ensure that appropriately detailed assessment of the impacts is undertaken.</p> <p>It is important to remember that the development strategy has to comply with NPPF policy requirements including the Duty to Co-Operate and the five year housing land supply. These requirements can only be met by the preferred option.</p>
<p>2: Focus on Welwyn Garden City and Ware</p>	<p>This option would have some advantages because it would avoid the negative landscape impacts of development in the Gilston Area; however, the landscape impacts would be significant North and East of Ware.</p>	<p>Whilst there could be benefits to this option and it could be considered realistic in some respects, it would not comply with the Duty to Co-Operate in relation to Harlow District Council because it does not include the Gilston Area. The deliverability of 3,000 dwellings North and East of Ware will need further assessment through the Broad Locations DPD.</p>

Option	Key appraisal findings	Council Response
3: Focus on Welwyn Garden City and Sawbridgeworth	A large extension West of Sawbridgeworth would not be self-contained, and would likely result in many car-based trips to Bishop's Stortford and Harlow. It is a relatively unattractive location for new employment; and landscape impacts would be similar to those for the Gilston Area.	This confirms the decision of the Council to drop the 'West of Sawbridgeworth' option from the selected development strategy. Also, as with Option 2, this option does not involve growth in the Gilston Area and hence would fail when assessed against the Duty to Co-Operate.
4: Focus on Stevenage	East of Stevenage could help to address some of Stevenage's unmet housing need; however, it would have highly negative impacts on the sensitive Beane Valley landscape and would be less self-contained than the Gilston Area owing to the greater distance from the railway station, town centre and main employment areas.	This confirms the conclusions of Chapter 4 of the Supporting Document. Land in North Herts is beyond the scope of this sustainability appraisal, but it is clear that East Herts Council will need to continue to discuss Stevenage's long-term housing needs and growth aspirations (beyond 2031) with Stevenage and North Herts Councils.
5: Focus on the Gilston Area	A larger development in the Gilston Area could be better self-contained and provide a wide range of community infrastructure. It would also remove the need for an urban extension at Ware which could be out of character with this small town. However, this option would not meet housing needs in the A10 Corridor Housing Market Area, in particular for Ware, and potentially also in the A1(M) Corridor.	This option would fail when assessed against the Duty to Co-operate in relation to Welwyn Hatfield Borough because the area is needed for a new secondary school to help provide additional schools capacity for Welwyn Garden City. This option would also risk not being able to find an appropriate location for school sites in the Hertford-Ware catchment area. It is questionable whether a development in the Gilston Area of 5,000 homes is deliverable by 2031.
6: Focus on a new settlement	Potential benefits of a new settlement in a transport corridor could in theory encourage self-containment, and the ability to relieve some of the pressure on air quality and the transport network in the busier southern parts of the district. However,	Policy DPS6: Long-term Planning commits the Council to further assessment of this option, in part as a contingency measure in the event that the Broad Locations DPD cannot resolve the challenges to development at those locations.

Option	Key appraisal findings	Council Response
	<p>this would largely depend upon its location and opportunities for bus and rail connectivity. Without such connectivity, this option has the potential to result in greater levels of out-commuting by car. A new settlement option of 5,000 homes may not be sufficient to enable high levels of self-containment.</p>	
<p>7: Focus on the Gilston Area, avoiding extensions to market towns</p>	<p>This option would mean that the impact of development on the landscape and historic character of the market towns would be lessened. It would also provide a self-contained development in the Gilston Area and reduce the air quality impacts. However, it would also mean that existing residents would not benefit from new community infrastructure (such as new schools and other community facilities) and additional local employment opportunities. The provision of the new Panshanger County Park and the remediation of the despoiled land north of Welwyn Road West of Hertford would be less likely to be achieved. Housing needs would not be met locally (i.e. near to the town where they arise), and some logical sites would not come forward.</p>	<p>Whilst the potential sustainability benefits of this option are acknowledged, it would not meet NPPF requirements in terms of the five-year housing land supply in the period 2016-2021. The scale and pace of development in the Gilston Area could not match the speed of delivery from multiple smaller urban extensions early in the plan period, since these latter locations can be brought forward simultaneously by different developers and do not rely on the provision of expensive infrastructure.</p>
<p>8: High growth at Welwyn Garden City, Ware, and the Gilston Area</p>	<p>Positives include the delivery of greater amounts of community infrastructure and services, potential for clean energy generation, and higher levels of self-containment. There would be a negative impact on the landscape in the Gilston Area and North and East of Ware (as well as at some of the locations</p>	<p>Whilst higher levels of development could in theory have some benefits, there are major question-marks surrounding the deliverability of such an approach. Detailed discussion on this matter is presented within the Supporting Document and the Interim Development Strategy Report. Whilst the</p>

Option	Key appraisal findings	Council Response
	allocated for housing surrounding the market towns).	current conclusion is that there is insufficient certainty regarding deliverability of higher levels of growth, further work will need to be done prior to submission in order to confirm this.