



**EAST HERTFORDSHIRE DISTRICT COUNCIL – DISTRICT
PLAN 2011-2033 – EXAMINATION**

**EXAMINATION HEARING STATEMENT – MATTERS AND
ISSUES PART 2**

**Prepared by Strutt & Parker (ID 1051550) on behalf of Catesby
Estates Ltd (ID 1051551)**

October 2017

East Hertfordshire District Plan 2011 – 2033 Examination

Thursday, 9th November, 2017

Matter and Issues for Chapter 4

Policy GBR1

Introduction

1. Strutt & Parker are instructed by Catesby Estates Ltd to submit this Hearing Statement to the Examination for the East Hertfordshire Submission District Plan 2011-2033 (EHSDP). Previous submissions on behalf of our clients have been made to East Hertfordshire District Council (EHDC) at the Regulation 19 stage of the Local Plan process.
2. This Hearing Statement addresses issues raised by the Inspector in the Matters and Issues Part 2 and specifically concerns Chapter 4 and Policy GBR1 of the Submission Plan.

Policy GBR1 – Green Belt

3. As acknowledged within the Matters and Issues for Part 2 of the Examination, it is clear that the wording of Policy GBR1 requires amendment in order for the policy to be Sound and to conform with national policy. This supports the representations that we have made previously with regard to this Policy.
4. We consider that, in order to comply with paragraph 83 of the NPPF, it is considered that Policy GBR1 should be re-worded to recognise the need to allocate sustainably located sites for residential development within Stanstead St Margaret's, Stanstead Abbotts, Hertford Heath and Watton-at-Stone as part of the Local Plan process, rather than relying on the Neighbourhood Plan process, which is not justified, effective or in accordance with national policy.
5. As set out in our client's Regulation 19 consultation response, particular concern was raised in relation to the Plan's over-reliance on longer-term strategic sites, and a lack of smaller/medium sized sites within the Plan to meet the district's shorter-term housing needs within the next 5 years. In this regard, Policy DPS2 of the Submission Plan sets out the intended supply across the Plan period. It is notable that paragraph 3.3.6 of the Submission Plan confirms that, in the first five years, only 3,161 homes will be built leaving a shortfall of 1,309 homes. As a consequence, there will be a significant under-delivery of 1,309 homes in the first five years. The Policy acknowledges that due to

past under-delivery a 20% buffer must be added to the first five-year period of the Plan as required by paragraph 47 of the NPPF.

6. The shortfall, taken with a 20% buffer, results in a total housing requirement for the first five years of the Plan for 6,041 homes. This equates to a dwelling target of 1,208 homes per annum. This is a very challenging target given that past delivery has been 488 per year according to the EHDC Annual Monitoring Report (AMR). It is therefore absolutely critical to ensure that the Plan provides for the “front loading” of suitable, achievable and deliverable sites to secure the necessary uplift in housing delivery in the earlier part of the Plan period. In our assessment, the Plan’s current mix of residential site allocations lacks the necessary flexibility to enable this boost to housing delivery to be achieved, and there is a significant risk that the current identified shortfall in housing delivery will roll forward (and potentially increase) as the Plan period progresses.
7. Our client has interests in sites at Land to the north of Stanstead St Margaret’s Road, Hoddesdon and Land south of High Street, Stanstead St Margaret. Neither of these sites have been allocated for development in the Submission Plan. However, both of these sites are capable of being delivered in the short term in order to contribute to meeting the identified housing needs for the District. Full information on their deliverability is set out within the Vision Statement for both sites, that was submitted as part of our Regulation 19 consultation response.
8. We acknowledge that the Inspector is not considering Omission sites as part of the Examination. However, in the district-wide context of needing to boost housing delivery, and in order for Policy GBR1 and the Plan to be considered justified, effective and in accordance with national policy, and therefore ‘Sound’, it is clearly important that housing allocations are forthcoming within the villages listed in Policy GBR1.
9. We fully support the text at the beginning of paragraph 4.5.2 in the Plan, which sets out that the four Group 1 villages listed within Policy GBR1 are considered to be sustainable locations for development. We also support the encouragement for new developments to be delivered in these settlements, especially in instances where they deliver community benefits. As set out in our Regulation 19 representation, both of our client’s sites represent opportunities to deliver a number of community benefits along with housing, which could include a primary school and significant public open space, while delivering quickly much needed housing on sites.
10. However, criterion II of Policy GBR1 is presently defective legally and also in terms of national planning policy, and in our assessment the Plan now needs to address the

strategic issue of a review of Green Belt boundaries at each of the four Group 1 villages, and where appropriate define the necessary residential site allocations in order to contribute to the Plan's wider objective of seeking to boost housing delivery.

11. Clearly, in respect of our client's interests and pursuant to our Regulation 19 representations and its accompanying supporting documents, it is our position that Land to the South of the High Street, Stanstead St Margaret should be allocated in the Plan for development of 125 dwellings with land for a new primary school, and that land to the north of St Margaret's Road, Hoddesdon (within Stanstead St Margaret's Parish) should be allocated for the development of 486 dwellings and public open space. As set out within the Landscape Statement, we consider that both sites presently fulfil a limited role in terms of Green Belt purposes and that they benefit from potentially future long-term defensible boundaries.
12. We Acknowledge that these sites represent Omission sites, that are not being specifically discussed at the hearing. We therefore seek a Modification to Policy GBR1 that establishes the need, in policy terms, for the early preparation of a specific Site Allocations Plan for the four Group 1 Villages of Stanstead St Margaret's Stanstead Abbotts, Hertford Heath and Watton-at-Stone that would secure the release of sufficient sites to meet the requirements of the Plan's Development Strategy. This could also provide guidance to assist in the preparation of future Neighbourhood Plans. Our concern with this approach, is that the Plan, through the present construction of Policy GBR1, has missed the opportunity to make the appropriate site allocations, and that the delivery of much needed new housing in each settlement will therefore be delayed. This could, of course, also increase the pressure for new development at other, less sustainable locations, which would be regrettable.
13. We therefore seek proposed Modifications to Policy GBR1 that address the need for appropriate residential site allocations to be made in the four Group 1 villages in accordance with the Plan's Development Strategy, and importantly that such site allocations can make an early contribution towards meeting the significant uplift that is required in housing delivery across the district during the first five years of the Plan period.