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East Hertfordshire District Plan 2011-2033 Examination in Public

Matter 2: The Development Strategy – Housing

Hearing Statement prepared on behalf of
Matterhorn Capital DC Bury Green S.A.R.L.

[Session Days 1-3 (3rd to 5th October 2017)]

September 2017

Contents

1.	Introduction.....	1
2.	Calculation of the Objectively Assessed Need for Housing (OAN) and the Housing Requirement (Questions 1-6).....	2
3.	Spatial Distribution/Supply and Housing Delivery (Questions 7-15).....	4
4.	The Approach to Housing Development in Villages.....	11

Appendices

Appendix A: Proposed Changes to Policies

Appendix B: Site Details – former GlaxoSmithKline site, Bury Green Site, Little Hadham

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For and on behalf of GVA Grimley Limited

1. Introduction

- 1.1 This statement has been prepared by GVA, acting as agent on behalf of Matterhorn Capital DC Bury Green S.A.R.L. (referred to 'Matterhorn' from hereon), the owners of the former GlaxoSmithKline site, Bury Green, Little Hadham (SLAA ref. 31/003) (refer to details at Appendix B).
- 1.2 The former agent acting on behalf of Matterhorn submitted representations to East Herts District Council (EHDC) in respect to Policies GBR2, HOU2, HOU3, VILL3, and VILL4 in December 2016, which included a request to participate in the oral part of the examination. Since then EHDC has published further evidence regarding housing need and land supply which has a material bearing over our position on the soundness of the plan as a whole. In particular, it is our view that Policy GBR2 and the control this has over the supply of development land in the rural area is fundamentally related to Policies DPS1-3, DSP5, and VILL1-4, and the issues to be discussed in Matter 2 as a whole. Therefore, while Matterhorn's December 2016 representations did not specifically address the full suite of housing policies we request to participate in the oral hearing of Matter 2 as a whole, including specifically Policies DPS1-3, DPS5, and VILL3-4.

Overview of Our Position

- 1.3 It is our view that the draft plan is not sound (not positively prepared, justified, effective, nor consistent with national policy) on the following grounds:
- (1) It does not plan to meet the full, objectively assessed, needs for housing;
 - (2) It fails to plan positively for the sustainable reuse of previously developed land outside of existing urban areas for housing; and
 - (3) There is significant uncertainty over the deliverability of a significant proportion of the identified supply of housing land for years 0-5.
- 1.4 It is our view that the draft plan can be made sound via the following modifications:
- (1) Plan to deliver at least 18,396 homes over the period, including a minimum of 7,145 homes in the period 2017-22;
 - (2) Plan more positively for the reuse of previously developed sites in the rural area for housing, where they are (or can be made) sustainable; and
 - (3) Identify an additional supply of deliverable housing land for years 0-5.

2. Calculation of the Objectively Assessed Need for Housing (OAN) and the Housing Requirement (Questions 1-6)

Total Requirement

- 2.1 It is widely acknowledged throughout EHDC's Local Plan examination documents that the NPPF requires local planning authorities to plan to meet objectively assessed housing needs in full, and that the objective assessment itself should follow a National Planning Practice Guidance (PPG) compliant methodology including using the most up to date household projection data published by the Office for National Statistics.
- 2.2 EHDC's Housing Topic Paper (July 2017) recognises that the requirement for 16,390 net additional homes in the period 2011-33 referred to in Policies DPS1-3 of the Submission Draft Local Plan is not sound. It refers to new OAN evidence published in July 2017 which indicates a requirement for 18,396 homes for the period 2011-33, equal to 836 homes per annum. It concludes that this figure should be carried forward in the new Local Plan necessitating revisions to Policies DPS1-3.
- 2.3 We concur with EHDC's updated position, and consider 18,396 net additional homes for the period 2011-31 to be a robust figure for the purposes of plan making.

2017-22 Requirement

- 2.4 The EHDC Housing Topic Paper (July 2017) identifies a 5-year housing requirement (2017-22) for 7,145 homes, equal to 1,429 units per annum. This accounts for a shortfall in delivery of 1,773 units in the 6-year period 2011-2017 following the 'Sedgefield' method (as required by the PPG) plus a 20% buffer to account for the district's persistent under-delivery over recent years. We consider this to be a sound approach to take.
- 2.5 The Topic Paper puts forward an alternative approach of addressing the 2011-17 shortfall whereby this is spread over the 10-year period 2017-2027 (more akin to the 'Liverpool' method). The justification given for this alternative is that an insufficient supply of deliverable land has been identified to meet this need. In principle, this is not a defensible position to adopt in our opinion. The NPPF requires local planning authorities to make every effort to identify a deliverable land supply to meet needs in full, noting that in practice there is no finite limit to the supply of deliverable housing land in this district, as confirmed by the district's

Strategic Land Availability Assessment (SLAA). Accordingly, we see no sound justification to divert from the PPPG's recommended Sedgefield method.

Summary

- 2.6 We recommend the following modifications to Policies DPS1-3 in order to make them sound (refer to proposed policy amendments at Appendix A):
- Increase the minimum housing requirement to 18,396 for the period 2011-33; and
 - Increase the requirement for 2017-22 to at least 7,145 (1,429 per annum).

3. Spatial Distribution/Supply and Housing Delivery (Questions 7-15)

Spatial Distribution (Role of Previously Developed Land)

- 3.1 We have no comments to make about the spatial distribution of the housing supply between each of the districts within the Housing Market Area (HMA).
- 3.2 We recognise the broad principles of the planned spatial distribution of development within the district itself, however we question the soundness of adopting the policy approach set out in DPS2 that is fully reliant on greenfield land to meet development needs outside of existing urban areas, where there is an alternative supply of previously developed land that is capable of meeting development needs in part and has priority for this purpose under the guidance including the NPPF (2012) and recent Housing White Paper: Fixing our broken housing market (2017).
- 3.3 One of the core planning principles of the NPPF is to encourage the effective use of land by reusing land that has been previously developed (para. 17) which should be read alongside para. 55 which supports the principle of housing development in rural areas.
- 3.4 The draft Local Plan follows this, by supporting the principle of redeveloping previously developed sites in the rural area beyond the Green Belt (Policy GBR2) and in supporting the principle of housing development in the rural area for a minimum 500 homes (Policy DPS2 (iv), DPS3, and VILL1-4). However, as the Plan is currently drafted, there is no link between Policy GBR2 and the housing policies: Policy GBR2 is silent on land uses; no such sites have been allocated for development in Policy DPS3; and no priority is given to previously developed land (over greenfield sites) in Policies VILL1-4.
- 3.5 The SLAA (March 2017) identifies a supply of vacant previously developed sites in the rural area outside of the Green Belt that (in our view) offer potential for sustainable development, but which have not been allocated for development in the draft Plan. The evidence base which justifies this (the SLAA) is in our view overly simplistic by bluntly assessing all such sites to be not 'suitable' for housing (in the context of the NPPF definition of being 'developable'), on the grounds of not being located within or on the edge of an urban area. This is instead of exploring in a reasonable level of detail, the merits of each site on a site-specific basis and their potential ability to deliver sustainable development.

- 3.6 There is a clear policy 'dis-connect' here which goes to the heart of the core sustainable development principles set out in the NPPF and raises in-principle soundness questions over the Plan's approach to identifying housing land supply. This has particular significance bearing in mind this Plan's preference for developing greenfield land which forms part of the exceptional circumstances justification for the de-designation of 6% of the district's Green Belt land.
- 3.7 As a starting point, in order to make the Plan sound, we recommend modifications to Policies DPS2-3 to introduce a clear policy support for the reuse of previously developed land where this would deliver sustainable development.

Housing Supply

- 3.8 EHDC's Housing Position Paper (July 2017) provides an updated Housing Trajectory that identifies a supply of land intended to deliver 18,681 homes in the period 2011-33, including 6,769 homes in the period 2017-22. Our comments below are based on the assumption that the updated trajectory is to form the basis of a revised Policy DPS3.
- 3.9 As a starting point, the updated supply exceeds the assessed requirement for 2011-33 (18,396) but falls short of the requirement for 2017-22 (7,145). Consequently, the Plan as currently drafted fails to meet the district's objectively assessed needs in full for the first 5 years of the plan, and is therefore not sound. There is a clear need to identify more housing land (either in the district or in the wider HMA via the duty to cooperate) that is deliverable in the period 2017-22 in order for the Plan to be effective and accord with national policy.
- 3.10 Further to this, on reviewing the identified supply set out in the updated Housing Trajectory we have fundamental concerns over the deliverability of a large proportion of the identified supply, particularly the assumptions made for the period 2017-22. Our concerns are set out in Table 3.1 below:

Table 3.1: Review of EHDC Updated Housing Trajectory, July 2017

Source	Projected Housing Supply		Deliverability Considerations	
	2017-2022	2011-2033	Planning Permission	Other Comments
Windfall Allowance	200	750	No	We understand that this is based on historic trend data, therefore appears reasonably sound but is by no means guaranteed.
Completions (2011-17) (as at 31/03/17)	-	3,244	Yes	-
Commitments	3,607	5,244	Yes	The EHDC Housing Topic Paper is not supported by an itemised breakdown of commitments or evidence of the expected timescales for delivery. Assumes a 100% conversion rate of commitments to completions which is not guaranteed. No detail of whether commitments are full or outline planning permissions. More robust evidence is needed to justify the assumption for 2017-22 in particular.
Villages	359	500	Yes (part)	359 of units are commitments (which we understand have not been double counted) which, again, are dependent on a 100% conversion rate which is not guaranteed. The assumed delivery of a further 141 units over the remaining plan period considered achievable based on the current commitment trend. However, tying to deliver to the preparation of Neighbourhood Plans poses a risk as to date very little progress has been made on many neighbourhood plans.
SLAA Sites – large sites over 10 dwellings	43	43	No	Underpinned by SLAA evidence, appears to be reasonable.
The Goods Yard, Bishop's Stortford (BISH7)	250	400	No	Planning application for hybrid planning permission for comprehensive redevelopment including up to 680 residential units (ref. 3/16/0530/OUT) was refused on 17 May 2017. No record of live appeal or revised planning application. Site has no other residential planning permission.
The Causeway/Old River Lane, Bishop's Stortford (BISH8)	-	100	Yes (Outline Only)	Outline planning permission granted for comprehensive mixed use redevelopment including 100 residential units (ref. 3/10/1964/OP) on 14 January 2013. Demolition has commenced. No record of reserved matters.
Bishop's Stortford High School Site, London Road (BISH6)	150	150	No	Planning application for outline planning permission for comprehensive redevelopment including up to 220 residential units (ref. 3/10/1013/OP) refused on 30 September 2010. Linked to application to relocate school (ref.

				<p>3/10/1012/OP) also refused.</p> <p>Co-joined appeal for residential units ranging from 125-220 units (four separate appeals) dismissed as a result of dismissal of appeal concerning relocation of school (PINS ref. APP/J1915/A/11/2149483).</p> <p>No record of revised planning applications.</p> <p>High school is still open and operational.</p> <p>Proposed Allocation BISH5 seeks allocation including a new secondary school in order to facilitate relocation of school to allow BISH6 to be released for housing.</p>
Bishop's Stortford South (BISH5)	250	750	No	<p>Note this site was the subject of refused application (ref. 3/10/1012/OP) and related appeal identified above.</p> <p>No live planning applications.</p>
East of Manor Links, Bishop's Stortford (BISH9)	50	50	No	-
Mead Lane Area, Hertford (HERT2)	100	200	Yes (part)	Full planning permission granted for 120 residential units on 19 November 2015. Subsequent variations to conditions and non-material amendment.
North of Hertford (HERT4)	50	150	No	SLAA refs. 03/001 and 03/120. Both sites considered unsuitable at present unless brought forward together.
South of Hertford (HERT5)	50	50	No	SLAA ref. 03/005. Site currently allocated as Green Belt and only considered acceptable if removed from the Green Belt.
West of Hertford (HERT3)	550	550	No	SLAA ref. 03/010. Site currently allocated as Green Belt and only considered acceptable if removed from the Green Belt.
Land to the North of West Road, Sawbridgeworth (SAWB2)	125	125	No	SLAA ref. 04/013. Site currently allocated as Green Belt and only considered acceptable if removed from the Green Belt.
Land to the South of West Road, Sawbridgeworth (SAWB3)	175	175	No	SLAA ref. 04/006. Site currently allocated as Green Belt and only considered acceptable if removed from the Green Belt.
Land to the North of Sawbridgeworth (SAWB4)	-	200	No	-
East of Stevenage (EOS1)	600	600	No	SLAA ref. 43/002. Site currently allocated as Green Belt. More robust evidence is required to demonstrate the site capacity and that this quantum of development is justified to come forward for 2017-22 in particular.
Land North and East of Ware (WARE2)	-	1,000	No	SLAA ref. 44/005. Site currently allocated as Green Belt considered unsustainable, therefore only considered acceptable if removed from the Green Belt and made sustainable as part of urban extension.
The Gilston Area (GA1)	-	3,050	No	Comprises multiple sites (landowners) to be brought forward through a concept framework in consultation with local communities, with further work to establish quantum, distribution and land uses prior to any planning applications coming forward.
Land East of Welwyn Garden City	210	1,350	No	SLAA ref. 26/003 identifies a number of constraints including:

(EWEL1)				<ul style="list-style-type: none"> - Area of Archaeological Significance with a number of features of historic importance in the locality. - The site also contains sand and gravel mineral reserves which would need to be extracted prior to any development. - Site is also in the Green Belt.
Total	6,769	18,681		

-
- 3.11 We do not challenge the assumed capacity of each site that could come forward over the plan period as a whole.
- 3.12 However, planning permission (arguably the most significant criteria for determining short terms deliverability) is in place for just 3,607 of the projected completions in the period 2017-22, which is just 50% of the requirement. We consider it overly optimistic/ambitious to assume that the projected completions will be achieved (in the absence of compelling evidence to the contrary) bearing in mind typical timescales necessary for the preparation and determination of a planning application, reserved matters applications and discharging conditions (where applicable), infrastructure delivery, and construction phasing, not to mention broader market risks.
- 3.13 On the basis of the above, in our view Policy DPS3 and the proposed revisions to this set out in EHDC's Housing Topic Paper (July 2017) do not identify a deliverable supply of housing land that is sufficient to meet the district's objectively assessed requirements in full in the period 2017-22, and therefore fails to accord with national policy (NPPF para.74).
- 3.14 It is our view that in practice there is no finite limit to the supply of deliverable housing land in this district (it is not subject to tightly defined administrative boundaries that prevent the outward expansion of settlements (or the establishment of new settlements), nor subject to any insurmountable physical or environmental constraints that have a similar effect). The SLAA identifies an unconstrained land supply of that has been discounted on the basis of criteria that we consider challengeable. With this in mind, we consider that it would be unsound to rely upon an early review of housing supply policies in order to meet the district's needs, as currently proposed by Policy DSP5.
- 3.15 It follows that in order to make Policy DPS3 sound, in our view it is necessary to identify an additional supply of deliverable housing land for the period 2017-22.
- 3.16 The SLAA provides the evidence base of the district's land supply position, which should be the starting point for identifying additional supply which is capable of delivering sustainable housing development in the period 2017-22. As part of this, it is our view that the role of previously developed sites in the rural area (outside of the Green Belt) should be further explored and optimised. As discussed above, Policy GBR2 supports the principle of development on such sites but is silent on land uses (a policy disconnect with DPS1-3). Bearing in mind the pressing need to identify additional deliverable housing land it is imperative that this potential source of supply is investigated further, to include a more positive and creative approach to considering whether and how such sites are or can be made sustainable, in line with the principles of NPPF para. 55.

- 3.17 To highlight the opportunity, we note that Matterhorn's site at Bury Green (see Appendix B) is available for development now and capable of delivering sustainable development. The landowner has commissioned a team to prepare a planning application for residential-led development which is intended to be submitted in early 2018.
- 3.18 As a minimum we recommend that Policy DPS3 be modified to include in-principle support for housing development on previously developed sites anywhere in the district (cross-referring to Policy GBR2) where they are or can be made demonstrably sustainable. We also recommend that Matterhorn's Bury Green site is allocated for residential-led development.

Summary

- 3.19 We recommend the following modifications to the housing spatial distribution and delivery policies:
- Policies DPS2 and DPS3 to be amended to introduce clear support for the principle of housing development on previously developed land (cross-referring to Policy GBR2) where this would deliver sustainable development; and
 - Policy DPS3 to identify and allocate an additional supply of deliverable land for the period 2017-22.

4. The Approach to Housing Development in Villages

- 4.1 Paragraph 55 of the NPPF promotes sustainable development in rural areas where it can be demonstrated that the development will enhance or maintain the vitality of rural communities.
- 4.2 The approach to distribution proposed by Policies VILL1-4 follows the Village Hierarchy Study (August 2016) which adopts an overly blunt assumption (in our opinion) that development anywhere outside of a Group 1 or 2 village is unsustainable, and therefore the potential from villages classed as Group 3 were not assessed further. Adopting a policy position that prioritises the growth of the largest villages over smaller ones on perceived 'self-containment' sustainability grounds is not necessarily the most sustainable solution as it ignores the availability of previously developed land, the presence of village specific development constraints (technical, environmental, landscape, infrastructure etc), and the notion that sustainable development in one village can support services in nearby villages regardless of the size of the existing village. The restraining element of Policy VILL3 (as currently drafted) in particular is considered to be unsound as a consequence.
- 4.3 Bearing this in mind, alongside the need to modify Policy DPS3 to identify additional deliverable housing land, in order to be effective we recommend that Policies VILL1-4 are modified to provide greater clarification that the 500 unit figure is a target which should be exceeded. Furthermore, that proposals for development in any of the settlements will be treated positively where they demonstrably constitute sustainable development, particularly where this involves the reuse of previously developed land (with cross-reference to Policy GBR2), and that such sites should be considered before greenfield sites.
- 4.4 For the purposes of clarity, in order to be effective Policy VILL3 should confirm that all settlements not listed in VILL1 or VILL2 are captured by this policy.
- 4.5 The delivery of Policies VILL1-4 is dependent on the preparation of Neighbourhood Plans. Neighbourhood plans are optional, and their preparation can take an extensive amount of time, which poses a risk of substantive delay to housing delivery. In order to be overcome this risk (be effective), the Policies VILL1-4 should make clear that planning applications for sustainable housing development in the rural area ahead of the preparation of a Neighbourhood Plan will not be treated as premature and will be dealt with positively.

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Appendix A
Proposed
Changes to
Policies

Policy DPS2 The Development Strategy 2011-2033

I. Provision will be made to meet the projected housing need of ~~at least 745 homes per year, making a total minimum requirement of 16,390~~ **18,396** homes in the period 2011-2033.

II. In the first five years of the Plan after adoption (2017-2022), the housing requirement will total at least ~~6,044~~ **7,145** homes (~~1,429 per annum~~), comprising:

(a) 3,725 based on projected housing needs for 5 years;

(b) 1,309 to address the shortfall from the period 2011-2017;

(c) 1,007 to allow a 20% buffer for choice and flexibility, brought forward from later in the plan period.

III. Sustainable Brownfield locations in the towns, villages and other settlements will be prioritised for mixed-use development. The remainder of the housing and development needs in the Plan period will be met on a range of greenfield sites across the District.

IV. Development in the villages shall be delivered in accordance with local initiatives led by Parish Councils, subject to the review triggers set out in Policy VILL1 (Group 1 Villages).

Policy DPS3 Housing Supply 2011-2033

The overall housing supply will meet projected housing need over the plan period 2011 to 2033.

Table 3.1: Housing Supply

Supply Source	Housing supply: First Five Years 2017-2022	Housing supply: Total 2011-2033
Windfall Allowance	250 200	750 800
Completions (2011-17) (as at 31/03/17)	-	2,625 3,244
Commitments	1,899 3,607	2,435 5,244
Villages	300 359	500
Deliverable sites in existing urban areas as identified by the Strategic Land Availability Assessment	88 43	88 43
Bishop's Stortford Goods Yard	250	400
Land at Old River Lane, Bishop's Stortford	0	100
Hadham Road Reserve Secondary School Site, Bishop's Stortford	0	163
Bishop's Stortford High School Site, London Road	150	150
North of Bishop's Stortford	800	2,529
South of Bishop's Stortford	250	750



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Bishop’s Stortford - East of Manor Links	50	50
Hertford - Mead Lane Area	100	200
North of Hertford	50	150
South of Hertford	50	50
West of Hertford	550	550
Sawbridgeworth - North of West Road	125	125
Sawbridgeworth - South of West Road	175	175
North of Sawbridgeworth	0	200
Land North and East of Ware (WARE ²)	0	1,000 (1)
East of Stevenage	600	600
Gilston Area	0	3,050 (2)
Land East of Welwyn Garden City (EWEL ¹)	210	1,350
<u>Additional sites (to include the former GlaxoSmithKline site, Bury Green, plus other yet to be identified sites)</u>	<u>376</u>	<u>=</u>
Total	5,897 7,145	18,040 18,681

(1) With a further 500 homes beyond 2033, subject to suitable mitigation.

(2) With a further 6,950 homes beyond 2033.

In addition to the above sources of supply, proposals for housing development on previously developed sites in the rural area (subject to Policy GBR2) will be supported, where it can be demonstrated that this would constitute sustainable development

Policy VILL3 Group 3 Villages

I. Those villages not identified as either Group 1 or Group 2 Villages are identified as Group 3 Villages.

II. Within Group 3 Villages and all other settlements (not listed in VILL1 or VILL2), limited infill development identified in an adopted Neighbourhood Plan will be permitted, in addition to development that is considered to be appropriate in the Green Belt and Rural Area Beyond the Green Belt.

III. All development should:

(a) Relate well to the village in terms of location, layout and connectivity;

(b) Be of a scale appropriate to the size of the village having regard to the potential cumulative



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impact of development in the locality;

(c) Be well designed and in keeping with the character of the village;

(d) Not represent the loss of a significant open space or gap important to the form and/or setting of the village;

(e) Not represent an extension of ribbon development or an addition to an isolated group of buildings;

(f) Not unacceptably block important views or vistas and/or detract from the openness of the countryside;

(g) Not be significantly detrimental to the amenity of neighbouring occupiers.

iv. Planning applications for housing in Group 3 villages submitted in advance of Neighbourhood Plans being prepared will be supported where it can be demonstrated that the proposal will deliver sustainable development

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Appendix B

Site Details



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Address:	Former GlaxoSmithKline Site, Bury Green, Little Hadham
Ownership:	Matterhorn Capital DC Bury Green S.A.R.L.
Site Area:	3.35 ha
Existing Use:	Currently Vacant. Implemented Planning Permission (ref. 3/08/0593/FP) for erection of two data centre (B8) buildings.
Proposed Use:	Residential (C3) for 50+ units and opportunity for associated complimentary uses.
Location:	Located within the settlement of Bury Green, approximately 3 km west of Bishops Stortford and 1.5 km south/east of Little Hadham. Bound by green field land occupied by Silver Leys Polo Club to the north west; open greenfield land to the west, south west and north east; and residential properties to the south-east.
Description:	Previously developed (brownfield) site. Occupied by GlaxoSmithKline (GSK) in use as an Animal Breeding and Licensed Experimental Facility (Sui Generis) until vacation in 2002. Site formerly comprised a number of buildings associated with former use including animal housing units, a boilerhouse, administration building, workshop and fire station. Those buildings to the north of the site have since been demolished, but hardstanding and foundations remain. Prior to demolition the former buildings comprised a floorspace of approximately 25,370 sq. m. (273,089 sq. ft.). Foundations of the substation associated with the implementation of planning permission for the data centre are also present in the north east corner of the site.
Accessibility:	Existing vehicular access from the north of the site via Millfield Lane. Millfield Lane runs north-south connecting Bury Green and Hadham Road (A120). A120 runs east-west connecting M11 and A10 providing connections to Bishop's Stortford, Hertford and London. Existing bus stops on Hadham Road (A120) approximately 2 km to the north. Provides services to Braughing, Brent Pelham, Buntingford, Hertford, Hunsdon, and Stevenage (routes: 20, 27, 28, 351 and 386).
Planning History:	Planning permission (ref. 3/87/1139/FP) granted on for the erection and replacement of animal housing units, boilerhouse, administration building, workshop and fire station, provision of new site access road car parking and sewerage treatment plant, provision of improved access of A120 at Millfield Lane junction and minor upgrading of Millfield Lane. Planning permission (ref. 3/08/0593/FP) granted on 10 July 2008 for the erection of 2 no. data centre buildings containing data handling computers, associated plant areas, technical support services and ancillary office area. 2 no external compounds, substation building and associated site works. Non-material amendment (ref. 3/10/0559/MA) granted on
Suitability:	Not located within the Green Belt, but Major Developed Site in the Rural Area Beyond the Green Belt' (RABGB) in the adopted East Hertfordshire District Council Local Plan. Existing policy position supports the redevelopment of this previously developed brownfield site. Suitable for development subject to detailed design considerations to identify scale and quantum of development on the basis that the site can be demonstrated as being, or made sustainable. Opportunity for pedestrian improvements to Millfield Lane and additional bus stops (east-bound and west-bound) on Hadham Road (A120) at Millfield Lane Junction (approximately 1km north) to improve connectivity to existing services and sustainability of the site to accommodate additional development capacity.
Deliverability:	Site in single ownership, vacant and available for development. There are no legal or ownership issues that would prevent the site coming forward for development now subject to planning permission.



Gateway Entrance (East)



Existing Buildings



Hardstanding from Demolished Buildings



Substation Foundations



Existing Access (North)



Existing Area of Car Parking



Neighbouring Residential Development to South

