

Appendix 16

HTD/497/40/1

5 December 2016

Planning Policy Team,
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Dear Sir or Madam,

**Re: REPRESENTATIONS TO THE PRE-SUBMISSION DRAFT DISTRICT PLAN 2016
CONSULTATION - NOVEMBER 2016**

We act on behalf of our client London and Regional, in response to the consultation of the Pre-Submission Draft Local Plan November 2016. We request that the contents of this letter and enclosures are taken into account and are addressed as the Plan progresses to examination.

Our client owns the Land West of Sele Farm Estate, Welwyn Road, Hertford, which is allocated for housing development as part of allocation HERT3 in the Pre-Submission Draft Plan, we support the continued allocation of this site for development in the Local Plan and consider that the Council should continue allocate the site for housing for the following reasons:

- The site is sustainably located within walking distance of a range of services and facilities in Hertford. The town has an excellent range of business, leisure and retail facilities, and there are good transport connections including two train stations.
- The site is the only Green Belt site around Hertford that benefits from an extant planning consent for substantial development (planning application reference: 3/13/1348/FN, which is currently subject to an application for the renewal of the consent, which members have directed for approval) and with its existing character and appearance should be considered brownfield land.
- The Council have recognised the need to meet 'objectively assessed needs for market and affordable housing' in accordance with the NPPF (paragraph 47). In order to meet this need, the Council has confirmed that some Green Belt sites will have to be released. Whilst the site is technically within the Green Belt, it has long been recognised as being suitable for redevelopment and provides a unique and deliverable opportunity to regenerate a redundant and poorly maintained part of the Green Belt.
- The site has clear defensive boundaries and is well screened ensuring that visual impact from the proposals will be minimal.
- The proposals will help secure the long term future of the County Wildlife Site and Archer's Spring which have a history of being used by trail bikes.
- The proposal will include significant recreation and access benefits, including new formal and informal recreation and natural play facilities, safe and attractive shared access corridors for pedestrians and cyclists from Bentley Road housing to the County Wildlife Site and new public open space.

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- Landscape benefits include substantial new native tree and scrub planting, extensive meadow creation, wetland and damp habitat, attractive landscape corridors and a landscape management plan with key objectives for biodiversity and sustainability.
- The proposals will contribute to the delivery of the Panshanger Park Initiative
- Highways have agreed access arrangements to the site as part of the extant planning consent, the proposal for 350 homes will not generate any more traffic than the consented leisure centre.
- There are no utility constraints impacting on the scheme's delivery.
- The NPPF states that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against housing requirements with an additional buffer of 5% to ensure choice and competition in the market (paragraph 47). The site can contribute to East Hertfordshire's five year supply of housing. This is particularly vital given the existing position of the land supply.

We have promoted the above site for residential development throughout the development of the Local Plan in East Hertford, responding to the initial Call for Sites consultation in June 2012, providing a response to the Preferred Options Consultation in May 2014 and subsequently preparing a Statement of Common Ground with East Hertford Council in April 2016. We additionally responded to the Council's consultation on the Infrastructure Delivery Plan in August 2016. We attach the representations to the consultations in 2014 and 2016 to this letter.

In our previous representations to the Preferred Options Draft we noted that the two housing sites to the West of Hertford are included in one allocation and this remains the case in this Draft Pre-Submission document. We remain concerned at this approach given that the sites are physically separated by Welwyn Road and other landscape features. Both sites are in different ownerships and will be delivered separately, albeit some assessment of the cumulative impacts of both sites will be required at the application stage. We consider that the Plan can be made more effective by separating these two sites into two separate allocations. This will simplify the monitoring process for the delivery of these two allocations following the adoption of the Local Plan.

Draft Policy DPS1 confirms that the Council will seek to provide a minimum of 16,390 new homes in the District in the period 2011 to 2033. We note that the West Essex and East Hertfordshire Strategic Housing Market Assessment (2015) confirms that the housing need in East Hertfordshire for the plan period is 16,400 or 745 per annum. We consider that the proposed housing target as a minimum is justified on the basis of the relevant technical evidence.

Draft Policy DPS2 states that provision will be made to meet the projected housing need of at least 745 homes per year, however, delivery will be front-loaded in the first five years of the Plan with a target of 1208 homes per annum between 2017 and 2022. We support this approach which we consider is in accordance with Paragraph 47 of the NPPF which requires that Local Authorities include a larger housing buffer where there has been a persistent under delivery of housing.

We consider that that Draft Policy DPS3 is effective as it identifies our client's site, as part of the HERT3 allocation, as deliverable within 5 years, which is in accordance with my client's aspirations for development on the site. Work is currently being undertaken to support a planning application for residential development at the site and it is expected that this will be submitted to the Council in Spring 2017. The Council's adopted Local Development Scheme (May 2016) anticipates that the Local Plan will be adopted by December 2017 and by this time

we would expect that the residential development will have consent so delivery can commence at the site. We note that the overall figure provided for both West Hertford allocations remains 550 homes. In our previous representations to the preferred options consultation, we highlighted that our client's site is able to sustainably deliver 350 homes, at a density of around 27 homes/ha. We consider that given the district's immediate need for housing, as outlined in Draft Policy DPS2, sites which are deliverable within the first 5 years of the plan should be required by policy to maximise the efficient use of land. We consider that increasing the allocated number of dwellings at our client's site will ensure that the Plan is positively prepared and will meet the objectively assessed development requirements, particularly in the first 5 years of the Plan.

Paragraph 3.4.1 highlights the increased objectively assessed needs in the District as a result of the 2014 household projections and Draft Policy DPS5 states that there will be an early review of the Local Plan to take account of additional housing needs arising from the 2014 household projections. We note that the Council does not consider that it has sufficient sites to meet the most up-to-date requirements and consider that in this context the Council should be seeking to maximise the development on all the current allocations and our client's site should be allocated for 350 homes. We have previously demonstrated through our representations to the Preferred Options Draft in 2014 that the site can easily accommodate this number without resulting in an uncharacteristically dense scheme.

Draft Policy HERT1 confirms a total of 950 homes over the plan period, 550 West of Hertford. As noted previously, given the need for more homes and the ability of our client's site to accommodate 50 additional dwellings, over and above the current allocation, this number should be increased to 600.

The development management considerations for planning applications at Land West of Sele West Farm Estate are set out in Draft Policy HERT3. We broadly support the range of issues to be considered and as previously noted we are currently in the process of preparing a planning application for the above site and are in the process of addressing these issues through the application supporting information.

Draft Policy HOU1 requires an appropriate mix of housing types and tenures on sites of 5 or more dwellings, we consider that this policy provides sufficient flexibility to allow sites to respond to local requirements in providing an appropriate mix of housing.

We support the principle of Draft Policy HOU2 which seeks the most efficient use of land. This is in accordance with the principles of the NPPF, which seeks for new development to make the most effective use of land. It is noted that the policy considers medium net densities for sites in more peripheral locations. In our previous representations to the Preferred Draft Local Plan we noted that the current allocation of 300 homes for our client's site would result in a density of 25 homes per hectare, which is relatively low. We consider a more effective use of the land will be to deliver 27 homes per hectare (350 in total), which is considered to be a medium net density in accordance with Draft Policy HOU2.

Draft Policy HOU3 seeks a maximum of 40% affordable housing on residential dwellings, subject to viability testing. We consider that this approach is sound and in accordance with national policy.

We note that Draft Policy HOU8 expects 5% of all plots on sites of more than 200 homes to be supplied for self-builders. Whilst we support the principle of the provision of plots for self-builders, which is in accordance with national policy, we consider that this percentage target is not justified as the SHMA (2015) does not identify a specific need for self-build. We consider

that the quantum of self-build plots should be dealt with on a site-by-site basis to ensure the most appropriate level of self-build plots is provided to meet the need in the district and the character of the site.

We would be grateful for written confirmation that these representations have been received and duly made, as part of this consultation exercise, marked for the attention of Duncan Parr.

Yours sincerely,


Duncan Parr (Dec 5, 2016)

Duncan Parr

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Enclosures: Representations to the Preferred Options Consultation, dated May 2014;
Statement of Common Ground Document, dated April 2016;
Representations to the Infrastructure Delivery Plan, August 2016.