

Appendix 8

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Dear Sirs

EAST HERTFORDSHIRE DRAFT DISTRICT PLAN – PREFERRED OPTIONS – PART OF SITE ALLOCATION HERT3 (ARCHERS SPRING)

We write to make representations to East Hertfordshire Draft District Plan, with particular reference to HERT3, Archers Spring, Land to North of Welwyn Road, Hertford. Our client strongly supports the inclusion of Archers Spring within Policy HERT1.

Draft Plan Policy DPS2 contains the development strategy for growth in East Hertfordshire over the plan period, it identifies that a minimum of 15,000 homes over the plan period (2011-2031) are needed (750 homes per year). The site is capable of coming forward early in the plan period as the site is in one ownership, reasonably small in scale and supporting document demonstrates early deliverability. Draft Policy DPS3 confirms that the site is deliverable in the first five years of the plan period.

Draft Policy HERT3 contains two separate sites to the west of Hertford. The sites are separated by Welwyn Road, farmland and Blakemore Wood. This clear separation demonstrates that the two sites should be considered separately although some impacts such as traffic and utilities will need to be assessed cumulatively at the application stage.

Our client's site is north of Welwyn Road, Policy HERT3 proposes that the site provides 300 units, however the site can sustainably accommodate 350 homes. A figure of 350 units would result in a density of 23 dph. Draft Policy HOU2 contains details on proposed housing density, it identifies that net densities of 30dph would normally be appropriate for sites in peripheral locations within and on the edge of these settlements. On this basis a density of 23dph should be considered acceptable and would ensure the effective use of the land in accordance with the NPPF (paragraph 111).

The Council should continue to support the redevelopment and allocate the site for housing on the basis that:

- 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 (planning application reference: 3/13/1348/FN) for substantial development 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). To 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.
- 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.

In summary, our client is supportive of the inclusion of Land to North of Welwyn Road within Policy DPS3 and HERT1. The position of the site, adjacent to the existing development boundary and close to existing facilities, demonstrates the sustainable nature of the site. There is a significant need for housing within the Borough and this site can contribute to housing delivery within the next five years.

Yours sincerely



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